

PROBATION SERVICE HAMPSHIRE PROBATION TRUST

EQUALITY IMPACT ASSESSMENT

Section Two: Full Impact Assessment

This “Equality Impact Assessment” documents the outcome of a full impact assessment on the specified function, policy or procedure, addressing the equalities strands of: Race, Gender, Disability, Sexuality, Faith and Age. It is to be completed, published as specified, and appended to policy and/or strategy documents.

1. Function Name, Policy or Procedure:

National Probation Qualification Framework – Hampshire Probation Trust implementation and recruitment

2. Aims and Approach of Function/Policy/Procedure

The new Probation Qualification Framework replaces the Diploma in Probation Studies with a qualification that meets Probation Officer training needs through a qualifying route for Probation Service Officers, with effect from April 2010. The design of the new probation qualification framework is underpinned by the principles of:

- the Probation Officer qualification remaining at Honours Degree level
- providing a pathway for PSO's to progress according to their capability, career aspirations and business need
- introduction of a minimum qualification for new PSO's
- a new methodology of combined academic and experiential learning
- work based learning accredited through Vocational Qualification level 3 for PSOs and VQ level 5 and 6 for PO's.

Preparation for the new framework has been in progress with HPT for some time. We have already increased the level of PSO staff with an accredited qualification enabling them to acquire academic credits towards the Foundation degree and have supported funding the Certificate in HE to PSOs who wished to undertake it. This has given them advanced standing in terms of entry into the new qualification framework. We have offered the Criminal Justice level 3 NVQ to all PSOs who wished to undertake it, this being the level of qualification that will, from 1st April 2010 be mandatory for all new PSOs and is also the entry gateway point for admission to the degree qualification under the new framework. Recognising that all the above is voluntary, we have set a standard of a minimum of three NVQ units in risk management that we see as a core

competence for PSOs in offender management to achieve. Two cohorts of PSOs have currently almost completed this and a third cohort commenced this March. Staff have been trained to act as Mentors and Assessors and we have set up systems and processes to run our own VQ centre from within Hampshire.

From April 2010 the Regional Training Consortia will be dissolved and a 'lead area' model will be put in its place. Hampshire has agreed to act as the lead area on the probation qualification framework for the South East Region. As lead area, Hampshire will have a pivotal role in liaising with the University and with NOMs in ensuring the future of effective training delivery in the region.

A competence based selection procedure will be used which features:

- competency based application form that recognises that many applicants will be existing PSOs but that will also be suitable for direct entrants
- one sift, undertaken locally, that will long-list against the competencies and eliminate both ineligible candidates and those whose application does not demonstrate a minimum level of core competences
- assessment centre – written test assessed by the University and verbal reasoning test. University will take lead in designing and marking the written test to ensure the pass mark represents demonstration of ability to complete a University honours programme.
- Candidates successful at the assessment centre will be invited to a combined interview and presentation at Trust local level. The interview will be competency based but will not be scripted. The written test will be available to the Panel and may form the basis for probing.
- Each Trust will notify candidates of the outcome, as per their normal recruitment procedures.

How Diversity and Equality is integrated into the Approach.

One of the aims of the PQF is to ensure a more diverse workforce and one which is better representative of local communities. Analysis of the national TPO data has shown that Hampshire recruits minority ethnic applicants proportional to the number of applicants. However, the number of applicants is low for both those from a minority ethnic background and also for men. Data is not available in relation to disability.

The new procedures should allow HPT to recruit more male and minority ethnic candidates as the pool in which we will be recruiting from, primarily PSOs, have a better proportion of these groups than the candidates NOMS attracted through national advertising.

Analysis of PSOs in Offender management indicates that we have 12% of staff who declare themselves as not "White British" and 30% that are male. This compares to applications under the national scheme to Hampshire of 7.5% that are not "White British" and 26% that are male.

In addition, under the new framework we have the freedom to design our own recruitment and selection process. Under the previous arrangements this meant lowering the standard of literacy required to progress through to the selection stage, an initiative that did little to ensure recruited TPOs would actually be successful when on the programme. We now have the freedom to design local initiatives for positive action

such as raising awareness of PSO opportunities amongst minority communities and offering staff support with the standard of literacy required for the graduate diploma route while they are PSOs so that candidates at application stage from under-represented groups have a genuinely improved chance of success. The recruitment process will be monitored across all equality strands (monitoring information is gathered and a regular reporting will be provided) in order to undertake an annual review of the effectiveness of the approach.

Our Guaranteed Interview Scheme for disabled applicants will be implemented within the recruitment and selection process from the assessment centre stage. Reasonable adjustments will be identified and implemented at every stage of the selection process as required.

The University has made clear as part of its NOMS tender bid that it will make reasonable adjustments to the design and delivery of the curriculum in order to meet the specific learning needs of individual learners with a disability. The University has a team of specialists within its Additional Support and Disability Advice centre who are able to assess the specific learning needs of any learner who declares a disability at the time of enrolment with the University and who has undertaken a formal ATW assessment (all assessments will be organised through HPT). On the receipt of an assessment from the learner the ASDAC will offer advice and if necessary provide appropriate assistive technology and related software to help minimise the impact of the disability on their academic learning. Disability information can be shared with the university as part of the essential personal information provided by the employer. There is accessibility for visually impaired people through braille, voice recognition, large print format and on line-learning.

In relation to maternity, paternity and adoption leave PSO's undertaking the new qualification framework would be able to suspend their studies, subject only to the timings within the regulatory framework. The PQF is available to part-time staff, but the deadline set within the regulatory framework will need to be met and there is the possibility that some work will have to be done in their own time. The framework does not allow for extended breaks other than those related to maternity/paternity/adoption.

There is no upper or lower age limit for the PQF.

Assessors will be drawn for PO's who will all have undertaken diversity training as part of their own qualification and practice. A mentoring programme is available and mentors have been, and will continue to be, trained in diversity and equalities issues. Consideration will be given to whether the BME Staff Support and Consultative group can also provide some additional support to trainees from a minority ethnic background.

3. What data/information is available & does it suggest differential impact for any of the groups identified as part of the impact assessment process?

(A range of different data may be used for this section – e.g. internal monitoring data, national reports/research, locally commissioned reports/audits/research, results of previous consultations/workshops, statistical data such as census data, Home Office Statistics)

The most relevant data for this assessment is staff data on the current PSO staff group. This provides us with information on current representation, the diversity profile of the pool from which we will be drawing candidates and a set of baseline data from which to compare monitoring data on applicants and successful candidates.

Race: Current PSO staff group who identify as other than “White British” is 12%, making the pool of potential recruits containing an over-representation of minority ethnic staff.

Gender (including transgender): Current PSO staff group has 30% male and 70% female staff (no information on transgender staff).

Disability: Current PSO staff group has 20% of staff who have disclosed a disability. This is a higher representation than the overall staff group and in line with the expected 18-20% of adult population.

Sexuality: Have not been gathering data on sexual orientation for long enough period to generate a report.

Religion or Belief: Have not been gathering data on religion or belief for long enough to generate a report.

Age: Current PSO staff group has a range of staff across the age categories, with the highest number in the 36-45 age category:

18- 25 year olds – 5%
26-35 year olds – 21%
36-45 year olds – 30%
46-55 year olds – 23%
56-65 year olds – 21%

If there are gaps in data provision how are these to be addressed in order to inform a full EIA?

4. What consultation has been undertaken, with whom?

(include here information on who has been consulted, the purpose of the consultation and how it was carried out)

The framework was consulted upon nationally by National Association of Probation Officer, National Approved Premises Association, UNISON, Association of Black Probation Officers, National Disabled Staff Network and the Probation Association.

HPT consulted on local implementation through its Equalities Consultation Panel which includes local community representatives, staff from diverse backgrounds, Union representatives, members of the BME staff support Group.

Feedback was also provided from an EIA consultation exercise undertaken in Yorkshire Probation Trust.

5. What are the main findings of the consultation undertaken (what positive or negative impacts were identified for any of the different groups)?

Consultation raised a number of areas for consideration, most of which have been addressed in Section 2 of this assessment report.

A key concern for the national assessment was that specific learning needs are a key issue to be addressed by HE providers; that flexibility be incorporated into the approach; that mentors and assessors are trained and competent in equality and diversity issues; that reasonable adjustments are identified and implemented at every stage of the process (with assessments in place to enable this); the key religious festivals are avoided on recruitment and training days; that action is taken to ensure that diversity is reflected in applicants and that the selection process is monitored.

Other issues raised by Yorkshire's assessment related to whether the training would be available to part-time staff; how maternity, paternity and adoption will affect a candidates training; whether there will be an upper/lower age limit; issue in relation to the impact of longer term disability related absence.

HPT's assessment mirrored some of the above and raised a couple of other points:

- The definition of a PSO needs to be made clear. At the moment there is some ambiguity as to whether this included Community Payback and AP staff. Depending upon who are included in this pool will have an impact on the diversity of staff that trainees are going to be drawn from.
- OM work will need to be undertaken once on the degree and so this may mean a move to another office/part of the county for some staff. Concerns were raised that this may be more difficult for staff with care responsibilities, and assurance sort that efforts will be made to accommodate these needs if possible. It was recognised that the requirement to be able to move across county was already part of the former process.
- Monitoring on applicants will be undertaken. Concerns that this should be across all 7 equality strands and that the monitoring form reflects this requirement (using the same categories as our monitoring form).

- The issue of the guaranteed interview scheme for disabled applicants was raised and it was explained that this would be available as a guarantee for a place on the assessment centre, the first stage of the process.
- Adjustments would be put in place at assessment centre and interview as per requirement. Largely around additional time.
- The Assessment centre tests may hold some level of disadvantage. The question was raised as to whether these had been impact assessed. This point needed to be checked.
- The question was raised as to whether the qualification could be obtained on a part-time basis. Although this is possible it is going to be difficult for part-timers to complete in part-time hours without using some of their own personal time to do so. In order to make the qualification fully accessible to part-time staff we would need to go back to NOMS and request the full design of a part-time route.
- Question was raised as to whether mentoring would be available for minority ethnic candidates. There is an overall mentoring scheme that supports the programme but there are not necessarily minority ethnic mentors. Need to check how well diversity is integrated into the mentors training and also consider the possibility of a role for the BME Staff Support and Consultative Group in providing for this.

6. Does this policy have the potential to cause unlawful discrimination, exclusion of some groups of people from its benefits or lead to negative relations?

This assessment has not identified any discrimination in the new Framework although there remain some areas that require further clarity – see section 7.

7. What measures have been identified in order for the policy/procedures to achieve its aims without risking any adverse impact?

- Further clarity on which staff are to be considered as a PSO in relation to the potential “pool” of candidates. Once this information is confirmed it may be necessary to address the figures in Section 3 of the assessment (PSO “pool”).
- Need to ensure robust monitoring systems are in place for every stage of the qualification, including the VQ process. Need to check that the monitoring form will cover all 7 equalities strands using the same categorisation as the HPT form.
- Need to check whether EIA undertaken on assessment centre tests
- Concerns about the equity of undertaking the qualification on a part-time basis need to be fed back up to NOMS
- Ensure that diversity and equality is well integrated into the mentors training and possibilities for additional support for staff with disabilities and minority ethnic staff sought.
- Need to clarify what the position would be in relation to any longer term disability related absence in relation to the qualification.

8. What action is now to be undertaken?

- HR Director will seek through appropriate channels a clear definition of a PSO.
- All 7 strands will be included in the monitoring process. Consortia will be approached to provide their previous analysis and methodology so the we can produce data that is comparable
- HR Director to raise with University the Equality Impact Assessment of their tests
- HR Director will feedback to NOMS on the issue of developing a part-time route
- Training for mentors will be reviewed in relation to diversity
- Chair of BME Staff Support and Consultative Group to be approached to nominate one or two volunteers to become mentors
- The issue of long term disability related absence will be taken to the PQF group for clarity.

9. Monitoring arrangements and review process

Monitoring will be established as identified in section 8 and reviewed on an annual basis.

10. How results will be published

The results of this assessment will be published on HPT's Intranet and on its website.

Signature of Policy Lead Christine Straw

Position Director of HR

Date 29th March 2010