



Transgender Policy and Procedure

TABLE OF CONTENTS

1. Procedural Aim4

2. Eligibility4

2.1 Inclusions

2.2 Exclusions

3. Definitions4

4. Responsibility..... 6

 4.1 Line Manager Responsibility

 4.2 BCH Human Resources Department

 4.3 Transgender Staff Responsibility

 4.4 Occupational Health & Wellbeing

5. Confidentiality & Record-keeping.....7

 5.1 Employment Monitoring

 5.2 Disclosure & Non-disclosure of Gender

 5.3 Vetting & Medical Screening

 5.4 References

 5.5 Prohibition of Disclosure of Information

 5.6 Disclosure by the Individual

 5.7 Changing Name and Status of Employee

 5.8 Previous Gender & Employment Records and Files

6. Arrangements for Existing Officers & Staff9

 6.1 agreement of support

 6.2 Timescales

 6.3 Redeployment

 6.4 Role Exemption

 6.5 Use of Facilities

 6.6 Notifying Work Colleagues

 6.7 Uniform

 6.8 Transitioning

7. Absence.....13

 7.1 Complications as a Result of Medical Treatment

8. Fairness at Work (FAW).....13

9. Workplace Benefits.....14

10. Genuine Occupational Requirements (GOR).....14

11. Associated Legislation.....14

12. Associated Policy and Procedure.....15

Appendix A: Guidance Notes for Staff and Line Managers..... 15

Appendix B: Agreement of Support Template.....15

1 PROCEDURE AIM

To provide support and guidance for the individual that will ensure fairness, dignity, confidentiality and respect of transgender officers and staff.

2 ELIGIBILITY

2.1 Inclusions

This procedure will apply to all Police Officers, the Special Constabulary, volunteers, Cadets and Police Staff, including full-time or part-time, fixed term, permanent, seconded or on a temporary basis and those in their probationary period who are employed by Bedfordshire Police, Cambridgeshire Constabulary or Hertfordshire Constabulary (BCH). This includes those above who are protected under the Equality Act 2010 by association.

For the purposes of this procedure the term staff will refer to Police Officers and Police Staff.

2.2 Exclusions

None.

3 DEFINITIONS

The Gender Recognition Act 2004 (GRA) makes the provision that people who have lived in their preferred gender for at least two years will be entitled to apply for a Gender Recognition Certificate (GRC) and, if a UK citizen, a new birth certificate. Changes to the Police National Computer (PNC) are required to reflect the gender change of successful applicants. The GRA also creates a new offence of disclosing confidential information.

The Equality Act 2010 states that it is unlawful for an employer to discriminate against any employee, job applicant or contractor on the grounds of that person's sex, or gender reassignment, or because they are married or in a civil partnership. The law also covers harassment and victimisation.

The employment provisions of the act cover any aspect of employment that may lead to detrimental treatment, such as recruitment, transfer, training and promotion, access to work-related benefits, facilities and services, and dismissal.

It is unlawful for an employer to instruct someone else to do something discriminatory – for instance, telling an employment agency not to hire a transgender person. Pressure to discriminate is also unlawful – for example employees threatening not to work unless their employer dismisses a colleague who has decided to undergo gender reassignment .

The Act also states a person has the protected characteristic of gender reassignment if the person is proposing to undergo, is undergoing or has undergone a process (or a part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex.

As soon as an individual indicates the intention to commence gender reassignment , they receive legal protection. Discrimination in this context means treating a trans person less favourably than you treat (or would treat) another colleague who is not undergoing gender reassignment .

Employers can be held responsible for discriminatory acts by its employees unless the organisation can show that it had taken such steps as were reasonably practical to stop the employee from doing the particular act or acts of that kind. Employees remain individually liable for their own discriminatory acts, even where the organisation is potentially liable.

An employer is discriminating if they treat the transgender person less favourably as a result of their sickness/injury absence relating to their gender reassignment .

This procedure provides a framework of guidance to all BCH personnel and its application has been assessed as being appropriate in most anticipated situations; where, in exceptional circumstances, it is deemed necessary to override the procedure, members of staff may be asked to discuss their actions and to make recommendations for appropriate changes to be made to the procedure.

This procedure relates to the employment and management of the cases of all BCH officers and staff that identify and present themselves as transgender, and may be intending to undergo, are undergoing or have undergone gender reassignment.

It should not be assumed that printed copies of this document are current; please refer to the policy database for the most recent definitive version.

4 RESPONSIBILITY

4.1 Line Manager Responsibility

Line managers have day to day responsibility for the management and welfare of their staff. Consequently they have a key role to play in supporting an individual who is undergoing the transition process. Specific duties will include the following:

- Liaise with the Human Resources Business Partner (HRBP) for guidance.
- When approached by the individual undergoing gender reassignment, conduct initial meeting and agree and record a plan of support.
- Maintain utmost confidentiality of any information relating to the trans person at all times.
- Provide support to the individual undergoing gender reassignment and ensure that any possible harassment is dealt with quickly and effectively using the appropriate procedures.
- Reasonable steps should be taken to accommodate the trans employee's requests for leave due to medical treatment.
- Consider, where contractual sick pay is exhausted, the possibility to agree periods of unpaid leave, a change in working hours or patterns, to help manage attendance.

4.2 BCH Human Resources Department

- Ensure that the Transgender Policy & Procedure is applied fairly and consistently.
- Record the agreed Agreement of Support agreed between the member of staff and line manager.
- Arrange for all administrative changes to take place (including new ID/warrant card, systems changes etc)
- Maintain utmost confidentiality of any information relating to the trans person at all times.

4.3 Transgender Staff Responsibility

- To approach their line manager as soon as possible to inform them of their decision to undergo gender reassignment.

4.4 Occupational Health and Wellbeing Unit (OHU)

Consideration should be given to the following:

- The expected timescales of medical and surgical procedures and what time off will be required, and subsequent support to return to work

- The individual will be able to self-refer for confidential welfare and counselling support through the Employee Assistance Programme (EAP), in line with the Attendance Management Procedure.
- Referrals should only be made by the individual or by the line manager with the consent of the individual.

5. CONFIDENTIALITY & RECORD KEEPING

5.1 Employment Monitoring

The BCH Application for Employment contains a confidential Equal Opportunities monitoring form which does ask the applicant if they have been through gender transition or gender reassignment. This information is entered on to the Human Resources database and will only be accessed for monitoring purposes. A person's gender identity may only be identified if you have permission to do so. 'Outing' a person as transgender is classed as direct discrimination under the Equality Act 2010 and could result in criminal charges under the Gender Recognition Act 2004.

Disclosure of the fact that an employee has obtained a gender recognition certificate is a criminal act subject to a fine.

5.2 Disclosure and Non-disclosure of Gender

There is no obligation for an individual to disclose their gender history as a condition of employment. If the person chooses to disclose this information, it is unlawful to use this information as a reason for not offering them the post.

As part of the recruitment process, a transgender person may disclose their gender status through relevant references to different names they were previously known as. In the event that an individual does make a disclosure, information relating to this should be dealt with the same sensitivity as any other personal disclosure.

Non-disclosure or subsequent disclosures are not grounds for dismissal.

5.3 Vetting / Medical Screening

Forms used for security checks, vetting and medical screening will seek information that could lead to identification of transgender status. This information will remain confidential and the disclosure of this information will be restricted to those closely involved who will be expected to

honour that confidentiality. Under Section 22 of the GRA, it is a criminal offence if this information is inappropriately disclosed.

5.4 References

If giving a reference for someone moving to a new job, a reference should be in the name which will be used in the new job and not disclose a former name. It may sometimes be necessary for a transgender person to disclose a previous identity in order for references from past employers to be obtained. In these cases strict confidentiality and respect for dignity should be applied

5.5 Prohibition of Disclosure of Information

Under the GRA, Section 22 (Prohibition of disclosure of information), it is an offence for an individual who has acquired 'protected information', (information relating to a person who has made an application under the GRA) in their official capacity (officer or staff), if they disclose this to any other person. Once a person has obtained a GRC there must be no disclosure of information relating to their previous gender unless for purposes outlined below.

It is not an offence under Section 22 to disclose protected information relating to a person who has applied for a GRC if the disclosure is for:

- The purpose of instituting, or otherwise for the purposes of, proceedings before a court or tribunal
- The purpose of preventing or investigating crime
- The information does not enable the person to be identified
- The person has agreed to the disclosure to be identified
- The information is protected information by virtue of Subsection 2(b) and the person by whom the disclosure is made does not know or believe that a full GRC has been issued;

Breaches of confidentiality should be treated in a serious manner and may amount to unlawful harassment and may be addressed formally using the relevant procedures.

5.6 Disclosure by the individual

Some transgender officers and staff may be open at work about their gender history. Making such information known to one person or a small group of people **does not mean** that a person necessarily wants the information to be known to everybody. An employee may choose to disclose information informally to their line manager and other colleagues, under such circumstance strict confidentiality should also be observed by parties involved and should be reminded of their obligations at the point of disclosure. Disclosure without the consent of the individual will be in breach of the Data Protection Act 1998.

Employees are expected to comply with the BCH Bullying and Harassment and the Equality and Inclusion Policy. Employees are expected to treat transgender officers and staff with respect and dignity and observe the right of privacy (see Human Rights Act 1998 – Article 8:Respect for your private and family life)

5.7 Changing name and status of employee

If the employee discloses their status as a transgender person or they are transitioning during their employment, a decision will need to be made as to when the employee's gender is changed in personnel records and public references e.g., web directories, security passes, etc. This decision should be made in agreement with the individual concerned, and this would normally be once the individual's Deed Poll is activated being signed and witnessed or when a statutory declaration has been completed.

5.8 Previous gender and employee records and files

Regardless of the legal status of the individual concerned, an individual's previous gender identity should be kept confidential, including the provision of references for ex-employees. Access to records regarding the change of status will be restricted to the HR Department and H&WB Unit.

Personal records of transgender staff should not refer to a previous name, any records made before a change of name should be updated.

Any records, such as medical records, may still record the identity of a trans person's gender history. For people without a GRC, some records (e.g., pension and insurance records), may also include a reference to their current legal sex.

Any record which would disclose to a third person that a change has occurred must be removed from files. All material that cannot be disposed of (e.g., copies of previous years Personal Development Records, Disciplinary Warnings that have not yet expired) should be saved in a 'Restricted' folder in the individual's electronic personal file with the instruction "Confidential, HR Manager Only".

6. Arrangements for existing officers and staff

6.1 Agreement of support

An agreement between the individual and the line manager should be recorded which enables the individual to give formal notification to the organisation and to facilitate the amendment of personnel records with the individual's change of name (if appropriate) and gender within agreed timescales. The need for flexibility in timescales must be allowed for and ultimately it is the individual's decision.

The following areas should be discussed with the trans person and be included:

- Is there a need for a risk assessment? for example if the individual is undergoing surgery and may need a workplace adjustment on a temporary basis.
- What is the expected point of change of name, personal details and social gender?
- What amendments will be required to records and systems?
- If at all, when and how should others be communicated with?
- How may colleagues be assisted with their understanding of and appropriate response to the issues?
- Is there a need for the H&WB Unit to assist with providing medical and other advice and support?
- Is there a need for revised duties and uniform change?
- Is there a need for liaison with CPS in respect of current cases?
- Reassurance of confidentiality of personal information

The agreement of support should be reviewed at least every 3 months, but should also be reassessed at each significant stage of the process. The line manager will agree review dates with the individual.

6.2 Timescales

The actions to be taken by BCH will depend on the individual's timetable of personal events around the transition process and this **must** guide managers. Set timescales **will not** be imposed on the individual as each person's schedule will be unique with varying levels of treatment or surgery.

Whether the individual is being treated on the NHS or privately will also affect the medical intervention time frames. It is reasonable to ask the individual for notice with regard to certain events (e.g., time off for surgery and recovery) but this may not always be possible.

6.3 Redeployment

An employee who is transitioning may wish to be redeployed on a temporary or permanent basis. There may be some duties, for example heavy lifting, that will be difficult for the employee to undertake if he or she is undergoing medical treatment. Where reasonable, the employer should try to accommodate the employee's wishes.

However, the employer should not put pressure on the individual to change jobs temporarily or make assumptions about his or her capability or wishes. For example, the manager should not remove a transgender employee from a public-facing role because the manager is concerned that the individual will not be accepted or will be subject to abuse. However, if, for example, the employee requests a temporary move to a back-office role while he or she transitions, the employer should agree to this where possible.

The individual may feel more comfortable being temporarily redeployed during the initial phase of the gender reassignment if the role involves face-to-face contact with the public. This should not be assumed and should be discussed in detail with the individual to ensure that maximum support is provided. No decision to remove the individual from the role will be taken without prior discussion and agreement.

6.4 Role Exemption

Provision is also made in limited circumstances under the Equality Act 2010 (Genuine Occupational Requirements section) to exempt posts where individuals have to share accommodation. It would not be reasonable on the grounds of privacy or decency, for an individual to do so with either sex while in the process of undergoing gender reassignment.

6.5 Use of facilities

Part of the negotiation process will be to agree at which point the individual changes their use of changing rooms and toilets. It is not acceptable for a transgender person to use separate facilities, e.g., an accessible toilet for disabled people, although this might be a short-term option during the early stages of reassignment as long as the individual is happy with the situation. An appropriate time for using the facilities of the 'new' gender is likely to be the change of social gender.

Other staff may express concerns but this does not justify, in law, discriminatory treatment. Transgender employees are entitled to expect support from their employer including any necessary discussions and explanations with other members of the workforce or members of the public.

A transgender employee should be granted access to 'men only, or 'women only' areas according to the sex which they permanently present. Failure to allow this is a breach of the Equality Act 2010 . Extra care and sensitivity needs to be taken in the case of female to male transgender employees, who may not be able to use urinals.

6.6 Notifying work colleagues

There is no general requirement or need to inform colleagues that an employee is undergoing gender reassignment. It would only be necessary to do so where the relationship with someone who knows the individual prior to the change of gender is to continue.

To assist, the Line Manager should discuss with the individual how widely they wish their decision to be made known. If the individual decides that colleagues should be informed, the Line Manager will arrange for this to be done in a structured way, informing them of the issues and taking the opportunity to educate relevant staff, who will be informed of the need to treat the individual with respect and dignity. The individual may wish to participate in the notification either in person or by letter, or they may wish it to be done by others (e.g. HR Manager, independent line manager, external organisation).

6.7 Uniform

A new uniform will need to be issued if worn. Although the individual will be expected to conform to presenting a professional image (see Presenting a Professional Image Policy and Procedure), flexibility in procedure may be agreed during the period of reassignment and should be included in the Agreement of Support. The Line Manager will discuss with the individual the arrangements for the issue of the new uniform, and its collection.

6.8 Transitioning

This is a highly personal and confidential stage in the process for the transgender person and is a process, rather than a single event, where the individual may begin the physical, social, and emotional journey of becoming their identified gender.

Employers will need to be kept informed of some parts of the transition process, but intimate and detailed medical questions should not be asked of the individual and should remain private. In particular, the individual should not be asked about the method that they take to undergo transition.

The individual should be involved in all discussions and decisions that will affect them at work regarding the transitioning process of gender reassignment.(see appendix A)

7. Absence

The Equality Act 2010 does not specify a minimum or maximum period of time employers should allow a person undergoing medical or surgical treatment related to the process of gender reassignment. The absence allowed to someone undergoing gender reassignment in terms of time off work should be compared equally with absence due to sickness or injury of other people which in their case is not related to gender reassignment and will be managed under the Attendance Management Policy and Procedure. Absence should not be disclosed as part of future reference.

An officer or employee who undergoes gender reassignment surgery will receive the appropriate sick pay in accordance with Regulation 28 (officers) or the Police Staff Council handbook (staff), and their pay will be reduced after the appropriate stated time period unless discretion to remain on full or half pay is granted under the normal criteria (see Attendance Management Procedure).

If the transgender person has been diagnosed with gender dysphoria or gender identity disorder temporary workplace adjustments may be put in place and should be recorded on the Agreement of Support document (see section 6.1). Line managers will need to ensure that this document is kept as confidential and will not be made available for scrutiny on force systems.

7.1 Complications as a result of medical treatment

Complications may arise as a result of medical treatment for gender reassignment resulting in prolonged incapacity for work. As with any other long-term illness the individual will be supported and monitored in accordance with the Attendance Management Policy and Procedure. If incapacity continues beyond normal expectations for the process undergone consideration may be given to the following:

- retirement on medical grounds
- redeployed to a different role
- Formal Capability proceedings

8. Fairness At Work Procedure (FAW)

Police officers and staff who have reason to believe that they have not received fair and equal treatment can raise their concerns through the BCH Fairness at Work Procedure.

9. Workplace Benefits

The Equality Act 2010, enables the same right to workplace benefits for transgender individuals in civil partnerships as for those in marriages.

10. Genuine Occupational Requirements (GORs)

Genuine Occupational Requirements (GORs) exist when the specific nature of a job, or duties attached to it, require it to be undertaken by members of one sex. The Equality Act 2010, in very limited circumstances, makes discrimination lawful in, for example, recruitment, training, promotion and transfer in a job where GORs apply.

The Equality Act allows for two kinds of GORs :

- On the basis of sex (the job requires either a man or a woman)
- On the basis of transition (where an individual is intending to undergo, is undergoing or has undergone gender reassignment but has not obtained a GRC).
- It would be lawful to discriminate against a female to male (FTM) transgender if it would also be lawful to discriminate against a man (e.g. restricting a job involving intimate body searching of women to women applicants).
- Using the example above, if a police officer working under a GOR with their birth gender is awarded their Gender Recognition Certificate (GRC), the Force may give consideration to transfer them to an alternative role on the grounds that they no longer have the required gender of the GOR. Legal advice should be sought before using GORs.

11. Associated Legislation

Gender Recognition Act (GRA) 2004

Equality Act 2010

Data Protection Act 1998

Human Rights Act 1998

A number of outside agencies exist who can provide support and guidance:

The Gender Trust, PO Box 3192, Brighton, BN1 3WR

(email: info@genderttrust.org.uk)

National Police Trans Association (NPTA) (www.ntpa.org.uk)

07799885440

Information relating to legal gender recognition, including application number of guidance packs, can be found at <http://www.grp.gov.uk>

12. Associated Policies and Procedures

Attendance Management Policy
Attendance Management Procedure
Sick Pay Policy
Bullying, Harassment and Victimisation Policy
Equality, Inclusion & Integrity Policy
[Equality Impact Assessment](#)
Transgender Guidance Notes for Staff and Line Managers
Disciplinary Procedure
Capability Procedure
Police Misconduct and Performance Regulations
Recruitment & Selection Policy and associated Procedures
NPCC Guidance regarding Search exemptions
[Employee Assistance Programme](#)

Appendix A

[Guidance for staff and line managers](#)

Appendix B

[Agreement of Support Template](#)

EQUALITY IMPACT ASSESSMENT

Date EIA started Date EIA finished	March 2017
<p>This Equality Impact Assessment is being undertaken as a result of: <i>Delete as appropriate</i></p> <ul style="list-style-type: none"> • A new or updated policy or procedure. • Any business process including operational and managerial decisions • A result of organisational change • Part of a project proposal • Procurement • Other (please state) <p>Note – For ease of use of this document , we will refer to all of the above as “proposal”</p>	

STEP 1 – Relevance

The general duty is set out in section 149 of the Equality Act 2010. In summary, those subject to the Equality Duty must have **DUE REGARD** to the need to:

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity between different groups; and
- foster good relations between different groups.

Authors have a statutory requirement to have **DUE REGARD** to the relevant protected characteristics shown below, whilst taking a common sense approach

- age
- disability
- gender reassignment
- marriage & civil partnership*
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

*marriage and civil partnership – the analysis applies only to the elimination of unlawful discrimination, harassment and victimisation.

Additional guidance can be found by accessing the EHRC website: <http://www.equalityhumanrights.com/advice-and-guidance/public-sector-equality-duty/guidance-on-the-equality-duty/>

Does this proposal have a direct impact on people who:	a) are any part of the Police workforce (including volunteers)?	YES
	b) reside in any part of England and Wales	NO
If NO to both questions	<i>Explain why and give rational</i>	No Further Action and Return to Sponsor for Authorisation
If Yes to either question	Continue through to Step 2	

STEP 2 – Consultation / Engagement

You should engage with those people who have an interest in how you carry out your work generally, or in a particular proposal. This may include former, current and potential service users, staff, staff equality groups, trade unions, equality organisations and the wider community. In deciding who to engage, you should consider the nature of the proposal and the groups who are most likely to be affected by it.

The proposal owner (Sponsor/Author) must be satisfied that consultation / engagement will take place with the relevant business lead and stakeholders.

This **MUST** include engagement with the following relevant groups:

- Equality and Diversity Specialist
- Staff Associations
- Staff Support Groups
- Relevant community groups and members of the public

In addition, consider who else should you consult with internally and externally?

Who might be affected?

Does what you are considering further the aims of the general duty, to

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity between different groups; and
- foster good relations between different groups.

Identify the risks and benefits where applicable, according to the different characteristics.

	Positive Impact or Benefits	Negative Impact or Risks
Age (<i>Consider elderly or young people</i>)	<i>This policy and procedure could apply to anyone of any age and is in place to ensure</i>	<i>This policy and procedure could apply to anyone of any age and is in place to ensure</i>

	the fair treatment of all staff.	the fair treatment of all staff.
Disability Groups (<i>Consider physical, sensory, cognitive, mental health issues or learning difficulties</i>)	This policy could apply to all staff and is in place to ensure fair treatment of all staff.	Potential impact could be experienced by staff with disabilities requiring reasonable adjustments on a temporary or permanent basis. Impact may be experienced by those who require an extended period of absence. Gender Dysphoria is a recognised medical condition.
Gender Reassignment (<i>Consider transgender, Transsexual, Intersex</i>)	The transgender policy and procedure and guidance notes for staff and line managers provides details of support and guidance for all staff.	Extended periods of absence due to surgery will need to be managed through the appropriate channels as detailed in the policy. Careful consideration needs to be given regarding the handling of sensitive information in line with the DPA 1998.
Marriage & Civil Partnership	Any changes to name and or status are detailed in the transgender policy and procedure.	No adverse impact. Changes to name and or status should be made in line with the member of staff's wishes in line with the policy and procedure.
Pregnancy and Maternity	Parental leave should be in line with organisational policy.	No adverse impact. Parental leave should be in line with organisational policy.
Race and Ethnic origin – includes gypsies and travellers. (<i>Consider language and cultural factors</i>)	This policy could apply to all staff and is in place to ensure fair treatment of all staff.	No adverse impact on the protected characteristic of race/ethnic origin identified.
Religious / Faith groups or Philosophical belief (<i>Consider practices of worship, religious or cultural observance including non belief</i>)	This policy could apply to all staff and is in place to ensure fair treatment of all staff.	No adverse impact on the protected characteristic of religion/faith identified.
Sex (<i>Male, Female</i>)	This policy & procedure is in place to ensure that all staff, male and female are treated fairly.	Extended periods of absence due to surgery will need to be managed through the appropriate channels as

		detailed in the policy. Careful consideration needs to be given regarding the handling of sensitive information in line with the DPA 1998.
Sexual orientation (<i>Consider known or perceived orientation, lesbian, gay or bisexual</i>)	This policy & procedure is in place to ensure that all staff, male and female are treated fairly.	The policy & procedure and guidance for staff and line managers confirms that gender identity and sexual orientation are not interchangeable terms. Assumptions should not be made that a transgender man or woman has a particular sexual orientation.

	Positive Impact or Benefits	Negative Impact or Risks
Have you considered how this decision might affect work life balance? (<i>Consider caring issues re: childcare & disability, safeguarding issues, environmental issues, socio economic disadvantage, and low income families.</i>)	All members of staff have the right to request a flexible working arrangement. Each request is dealt with on a case by case basis in line with the Flexible Working Policy.	There has been no negative impact identified.

STEP 3 – Assessment

Complete the EIA by analysing the effect of your proposal and detail the outcomes.

What were the main findings from any consultation carried out?

What feedback has been received?

Using the information you have gathered and consultation that you have undertaken answer the following questions. This will help you to understand the effect on equality your proposal might have.	
Has the feedback indicated any problems that need to be addressed?	Comments from the NTPA have been taken into consideration.
Describe and evidence any part of the proposal which could discriminate	
Can the adverse impact identified be justified as being appropriate and necessary? If so, state what the business case is:	
Where impact and feedback identified, what, if	

anything can be done?	
What outcome will be achieved that demonstrates a positive impact on people?	

STEP 4 - Monitoring and Review

Equality analysis is an ongoing process that does not end once a document has been produced.

What monitoring mechanisms do you have in place to assess the actual impact of your proposal?	Fairness at Work, employment monitoring,
Review Date: First review must be no later than one year.	March 2018

STEP 5 - Sign Off

Once the Equality Impact Assessment is complete it should be signed off by the Proposal Sponsor. This sign off is confirmation that the analysis is accurate, proportionate and relevant and actions will be delivered as required.	
Approved by Senior Officer / Proposal lead	Having considered the potential or actual effect of this proposal on equality, our assessment demonstrates that the proposal is robust and the evidence of our screening shows no potential for unlawful discrimination. We have taken all appropriate opportunities to advance equality and foster good relations between groups. Date: Name: