

# CRIMINAL RECORDS BUREAU – RACE, DISABILITY AND GENDER EQUALITY SCHEME



Home Office



Criminal Records Bureau



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# Foreword

I am pleased to introduce the Criminal Records Bureau's (CRB) Disability, Race and Gender Equality Scheme which enters into operation as of 1 May 2007.

The Scheme is associated with the overarching Home Office Disability, Race and Gender Equality Scheme. It connects not only to the strategic objectives and service delivery aims of the Home Office but also to the commitment across all customer groups to promote equality and community cohesion within society.

As an executive agency of the Home Office the CRB is required to supplement the Home Office Scheme with a Scheme that specifically addresses CRB business functions and customer groups.

Furthermore, both the Home Office and CRB Disability, Race and Gender Equality Schemes incorporate a focus on the statutory duty to promote gender equality that entered into force on 6 April 2007 as a result of the Equality Act 2006.

The development of this Scheme allows the CRB to be confident, going forward, of its ability to meet the CRB mission statement to: *"Help protect children and vulnerable adults by providing a first-class service to support organisations recruiting people into positions of trust."*

The delivery of a first-class service requires an ongoing understanding and consideration of internal and external customer groups to ensure parity in service delivery and the minimisation or mitigation of adverse equality impact.

This will be achieved through the implementation of Equality Action Plans for each of the three equality duties addressed within this Scheme. The Action Plans act as the foundation of the Scheme and will be reinforced by ongoing invocation of key CRB management processes to ensure that equality remains an

essential consideration in the review and development of CRB business activity.

The Disability, Race and Gender Equality Scheme replaces the previous Associate Race Equality Scheme and Associate Disability Equality Scheme as of 1 May 2007.

**Vince Gaskell**

A handwritten signature in blue ink that reads "Vince Gaskell". The signature is written in a cursive style with a large, looped "G" and "S".

*Chief Executive  
Criminal Records Bureau*

# 1. Background

## 1.1 The CRB Purpose

The CRB was established in March 2002 under Part V of the Police Act 1997 in response to public concerns about the safety of children and vulnerable adults. It became an Executive Agency of the Home Office in 2003 and is a public-private partnership (PPP) with Capita.

Operating under Home Office Objective 1 – *people are and feel more secure in their daily lives* – the CRB works with police forces and other stakeholders in ensuring that the CRB is able to meet its mission statement.

This is achieved through the Disclosure Service which enables organisations to gain access to important criminal records information for recruitment and licensing purposes. The CRB therefore assists organisations in their recruitment and retention practices to identify candidates for relevant positions or employment who may be unsuitable.

In doing this the CRB helps to ensure that society protects vulnerable adults and children, including across all equality strands.

## 1.2 The CRB Customer Base

The CRB operates through a network of organisations known as Registered Bodies, which are registered in accordance with legal requirements as customers of the CRB. Registered Bodies are authorised to submit applications to the CRB for Standard or Enhanced Disclosures for positions or employment exempted from the provisions of the Rehabilitation of Offenders Act 1974. This means that Registered Bodies are able to consider current and spent convictions, cautions, reprimands and warnings as part of employment vetting procedures. Further information is also provided within Enhanced Disclosures where approved

intelligence is released by police forces within England, Wales, Northern Ireland and Scotland.

Whilst Registered Bodies are the principal customers of the CRB, each Registered Body also has a range of clients, employees or potential employees with differing individual needs. Some of those may identify themselves as falling within the equality strands covered by this Scheme, and this may subsequently impact on their access to the Disclosure Service.

This impact can only be brought to the attention of the CRB through the Registered Body network and in the future will be addressed as part of active consultation with external customer groups on equality matters through the CRB Consultative Panels. Employees of the CRB are another significant customer base considered within the remit of this Scheme and are vital to the successful delivery of the Disclosure Service.

### 1.3 The CRB Service

As outlined at section 1.2 the CRB operates via a network of Registered Bodies as business partners. The role of the CRB is limited to the provision of accurate data reflected in the Disclosure regarding the criminal footprint of individuals applying for relevant positions or employment through the Registered Body network. This is achieved by liaising with other government agencies including local police forces and other data providers.

Applicants to the Disclosure Service provide their information to the Registered Body on a voluntary basis via the Disclosure application form. Whilst the CRB will deal with disputes on the contents of information provided on the Disclosure or provide information on the progress of the Disclosure application, there is limited direct contact between the Agency and individual applicants.

Although the CRB Code of Practice requires Registered Bodies to have a policy on the recruitment of ex-offenders it is not the role of the CRB to monitor offers of employment, including to those falling within equality groups. Individuals aggrieved by biased selection procedures are therefore advised to approach the Commission for Equality and Human Rights or take up civil action.

The focus of this Scheme is therefore to indicate how the CRB will seek to ensure that it considers equality issues when implementing, deciding or reviewing business activity within its remit and considering the limitations therein.

The CRB will also consider representations regarding access to the Disclosure Service where that is frustrated as a result of a relevant equality consideration.

## 1.4 Recent Developments

Prior to the publication of this Scheme the Criminal Records Bureau had instigated the following initiatives in response to the specific duties relevant to race and disability equality:

- The implementation of the Associate Race Equality Scheme in September 2005, including key delivery milestones for all business functions of the Agency.
- The implementation of the Associate Disability Equality Scheme in December 2006, including key delivery milestones for all business functions of the Agency.
- The completion of the first comprehensive Race Equality Impact Assessment in September 2006 which secured the approval of the Commission for Racial Equality, associated stakeholders and government Ministers.
- The creation of the CRB Equality Forum in December 2006 to co-ordinate the strategic direction, delivery and review of equality commitments.
- The finalisation of detailed guidance on the duty to Equality Impact Assess business activities in March 2007. This Guidance is generic in its application to all key business functions and may be used for both current and future specific equality duties.

The CRB has also ensured the following:

- The maintenance and delivery of the CRB Welsh Language Scheme under the Welsh Language Act (1993) which incorporates the provision of bilingual documentation and Customer Helpline facilities to provide parity of service delivery to customer groups within the Welsh territory.

- The maintenance and delivery of the CRB Off-line service to provide discretion to transgender applicants to the CRB Disclosure process in respect of identity verification requirements.
- The establishment and implementation of an exceptions process to identity documentation requirements in response to the individual circumstances of Disclosure applicants.

The initiatives demonstrate the strong focus that the CRB has developed to ensure that it proactively addresses its objective to promote equality within its business activities whilst addressing its statutory obligations as a public body. The outlined initiatives relate not only to internal human resource operations but to external customer groups of the CRB and their access to, and use of, the CRB Disclosure Service.

Further detail on the CRB Impact Assessment process is available as a separate public document to this Scheme on the CRB website at [www.crb.gov.uk](http://www.crb.gov.uk).

## 2. Developing the Disability, Race and Gender Equality Scheme

The development of the CRB Disability, Race and Gender Equality Scheme is the product of extensive internal and external consultation as outlined below.

### 2.1 Internal Consultation

- Regular consultation with the Home Office Race Diversity Action Team (RDAT) to identify the scope, detail and requirements for the creation of the CRB Disability, Race and Gender Equality Scheme.
- Focused consultation with internal Human Resource specialists regarding internal customer groups and their requirements. This included a detailed consideration of existing data capture, monitoring, recruitment, retention, training and promotion practices as part of preparing the Equality Action Plans for consultation purposes.
- Global internal communications with all staff to request confidential and, where requested, anonymised feedback to assist in identifying the key objectives and staff requirements relevant to each equality strand via open feedback on the Equality Action Plans. All 392 members of the CRB workforce were reached through the consultation. This does not incorporate consultation with employees of Capita, the private sector partner of the CRB.
- Internal consultation at senior management level to discuss the potential requirements of external customer groups for inclusion in the Equality Action Plans.
- Direct communication with representatives of the Public and Commercial Services Union (PCS) for open feedback on the Equality Action Plans.

- Review meeting at senior management level to discuss the outcomes of the consultation exercise and refine the Equality Action Plans accordingly.
- Review meeting with staff to discuss the outcomes of the consultation exercise prior to finalisation of the Scheme and Equality Action Plans.

## 2.2 External consultation

- Direct email communications with 120 members of the CRB Consultative Panels on the identification of key objectives and external customer group requirements via open feedback on the Equality Action Plans.
- Global external communications via mail-shots to the Registered Body network to offer the opportunity for open involvement in the identification of key objectives and external customer group requirements via open feedback on the Equality Action Plans. Communications were issued to 1097 Registered Bodies representing approximately 10 per cent of the current customer network.
- Use of the CRB website to announce the opening of the consultation exercise and afford the opportunity for open feedback on the Equality Action Plans to individual users of the CRB Disclosure Service.
- Specific communications with the Disability Rights Commission, the Equal Opportunities Commission, the Commission for Racial Equality and the Refugee Council for their comments, or those of their stakeholders, on the Scheme prior to finalisation and to offer the opportunity for open feedback on the Equality Action Plans.

## 2.3 Review of Consultation and Approvals

The consultation period for the Disability, Race and Gender Equality Scheme extended from 25 February to 19 March 2007 in order to ensure compliance with wider Home Office requirements. Representations from all parties were considered in detail by senior managers prior to submissions to the Director of Resources and Strategy for approval of the final Scheme.

Representations were incorporated where appropriate into the Scheme and its Action Plans.

## 2.4 Ongoing Review

Ongoing consultation resultant from the Equality Impact Assessment process may also lead in the future to consideration of the need to amend or refine the finalised Equality Action Plan objectives under each equality strand. This will form part of the stipulated annual review that has been incorporated into each of the Equality Action Plans within this Scheme.

The CRB Equality Forum will act as the conduit for external representations from customer groups and/or representative organisations seeking to make representations on refinement or amendment of the Equality Action Plans.

# 3. The CRB Approach to Equality Duties

## 3.1 The CRB General Equality Statement

The CRB's ongoing commitment to equality duties as outlined in the foreword to this Scheme is encapsulated in the following Equality Statement:

*“The CRB, an Executive Agency of the Home Office, is dedicated to promoting equality, fairness and respect. We will create a working environment where diversity is recognised, valued and celebrated. In delivering our business we will engage fully with our diverse society. We will take care to assess the impact of our policies and their implementation on race, religion and belief, gender, disability, sexual orientation, gender identity and age equality. We will:*

- *Employ a workforce that reflects, at all levels, the diversity of the communities where they work and society as a whole;*
- *Treat all our staff and customers with dignity and respect;*
- *Develop all our staff to realise their full potential;*
- *Take positive action to secure equality of opportunity;*
- *Ensure that recruitment, selection, appraisal, training and career progression processes are fair, objective and free from bias or stereotyping; and*
- *Carry out impact assessments on services against bias and prejudice.”*

This statement reflects the broad CRB commitment to equality over and above the statutory requirements relevant to disability, race and gender groups.

## 3.2 The CRB Disability, Race and Gender Equality Statement

The CRB announces the following equality statement relevant to the specific disability, race and gender equality duties that are the focus of this Scheme:

*“The Criminal Records Bureau is committed to ensuring that its policies, decisions, processes and practices do not adversely impact on any group as a result of differences of disability, race or gender where that impact can not be justifiably avoided or mitigated in seeking to actively promote equality of service delivery to all internal and external customer groups.”*

This statement will guide the CRB Equality Forum and its activities in ensuring that the duty to impact assess business activity for adverse equality impact is conducted both routinely and rigorously.

## 3.3 The CRB Recruitment Equality Statement

The following statement demonstrates the CRB commitment to ensuring that valuing and developing a representative workforce remains key to the ongoing success of CRB service delivery.

*“The Criminal Records Bureau is committed to a policy of equal opportunity for all staff, regardless of ethnic origin, religious belief, political affiliation, sex, sexual orientation, disability or other irrelevant factor. Selection for the post will be based on merit: the only criteria for advancement in the agency are the individual’s ability, qualifications or suitability for the work and positive assistance will be given to develop the individual’s full potential in the Service wherever possible. To help us monitor equal opportunities in the recruitment process please complete the Equal Opportunities Monitoring Questionnaire.”*

Adherence to this statement will ensure that CRB recruitment and retention practices are open and transparent in seeking to ensure that Home Office targets on the recruitment and retention of Black, Minority and Ethnic Groups are achieved and that equality across disability and gender groups is positively promoted.

Associated with this commitment will be the maintenance of the Guaranteed Interview Scheme for persons falling within the definition of the Disability Discrimination Act 1995, as amended. These commitments are reflected in each of the Equality Action Plans in specific detail.

## 4. CRB Management Processes

The statements outlined above are supported by the internal management processes in place to ensure compliance with the legal duties outlined in Chapter 12 of this Scheme (Background Information) to actively promote equality of race, disability and gender. These mechanisms are outlined below.

### 4.1 The CRB Equality Forum

The CRB Equality Forum has been established to address the statutory duties in respect of both current and anticipated legislation. The Forum is chaired by the Director of Resources and Strategy, reflecting the profile afforded to disability, race and gender equality within the CRB.

The key purpose of the Equality Forum is to ensure that the CRB is legally compliant with the outlined statutory duties in all aspects of its business activity and in line with the Disability, Race and Gender Equality Statement. The remit of the Equality Forum incorporates all business activities undertaken by the CRB, including existing and developing policies, practices, processes and procedures.

The Equality Forum is committed to undertaking a gap analysis of organisational activities in the short term in order to generate a prioritised list of activities requiring review to identify adverse equality impact to race, disability and gender groups.

The Forum will use the analysis to identify the requirements going forward for Initial Impact Assessment of current business activity. Thereafter, the Forum will instruct on the requirements for Full Impact Assessment of the activity where a potential adverse equality impact is identifiable from the Initial Impact Assessment presented.

The Forum is also required to consider and approve the recommendations of the Full Impact Assessment process, for example where recommendations for the mitigation of adverse equality impact are made. This may result in an agreed decision to refine, replace or withdraw the activity or in a decision by the Forum that the adverse impact identified can be justified for the pursuit of objective business aims.

The Forum is guided by specific Terms of Reference which identify the escalation process to the CRB Executive Team. Where relevant the Executive Team may refer sensitive matters to Ministers for consideration.

## 4.2 CRB Diversity Champions

Each Member of the Equality Forum will act as the Diversity Champion for the business function that they represent. This duty requires the Member to ensure that their respective business function:

- Is represented at each Equality Forum to ensure understanding and awareness of work in other areas, legislative and organisational changes
- Updates the Equality Forum on policy and procedural developments within their business function to allow the Forum to monitor the promotion of the equality duties and the requirements for Initial and/or Full Equality Impact Assessments
- Independently undertakes Initial Impact Assessments of all new business activities (policies, decisions, processes, practices) in line with relevant guidance for consideration by the Equality Forum
- Undertakes Full Equality Impact Assessments as directed by the Forum in line with the relevant guidance.

The table below identifies the key senior managers acting as Diversity Champions for key business functions through the Equality Forum:

Director of Resources and Strategy
Head of Business Development
Head of Policy
Head of Customer Relations
Head of Procurement
Head of Internal Communications
Head of External Communications
Head of Operations
Senior Human Resources Manager
PCS Union Representative

## 5. Equality Impact Assessment in the CRB

The Director of Resources and Strategy approved in March 2007 a specific process entitled “Guidance on Equality Impact Assessment in the CRB”. This guidance supports the CRB Equality Statement by ensuring that the approach to Initial and Full Impact Assessments across business functions is consistent, detailed and appropriate to CRB service delivery requirements.

The Guidance assists Diversity Champions and their senior staff to:

- Understand the legislative background and requirements to the duty to promote equality of race, disability and gender
- Understand the functions of the Equality Forum and the approvals process
- Understand the requirements for consultation and research
- Understand how to undertake each stage of the Equality Impact Assessment process
- Understand how to rationalise and present the outcomes of both stages of the process for the consideration of the Equality Forum.

The Guidance is available as a separate public document on the CRB website at [www.crb.gov.uk](http://www.crb.gov.uk)

## 6. Risk Management

In addition to the escalation process outlined earlier from the CRB Equality Forum to the CRB Executive Team, the specific duties addressed within this Disability, Race and Gender Equality Scheme have also been identified as a strategic risk for the CRB.

This development is outlined as follows:

RISK	Unmanageable demand
RISK OWNER	Director of Service Delivery
SUB-RISK	The Agency is unaware of sector-wide strategic developments which affect demand
IDENTIFIED CONTROLS	Controlled management of the statutory framework surrounding equality duties
SUB-RISK OWNER	CRB Policy Team
CURRENT RISK STATUS	Static

Inclusion of the implementation of the Equality Action Plans at the core of this Disability, Race and Gender Equality Scheme as a key organisational risk will ensure that:

- The implementation in practical terms of the Equality Action Plans is monitored via the risk management function over and above the role of the CRB Equality Forum
- There is a further opportunity for escalation of issues surrounding the objectives and implementation of the Disability, Race and Gender Equality Scheme to the CRB Executive Team or Management Board in order to ensure the objectives are achieved.

## 7. Overview of CRB Business Activity

The management and impact assessment processes outlined above will apply across all business functions of the CRB through the strategic role of the Equality Forum and in practice via implementation by Diversity Champions. The key business functions of the CRB are outlined in the following table.

## Key CRB Business Functions

Business Function	Directorate	Equality Lead	Key Functions
Policy	Chief Executive's Office	Head of Policy	Ensure organisational compliance with the CRB statutory framework and other legal duties. Ensure provision of policy advice to all business functions and manage both organisational relationships and information. Ensure consideration of Action Plan objectives in policy development.
Customer Relations	Service Delivery Directorate	Head of Customer Relations	Manage the Registered Body network, registration conditions, assurance and enforcement. Deal with fraud casework, maladministration, disputes. Deal with customer enquiries on the Disclosure Application Process. Ensure consideration of Action Plan objectives in policy development.
Procurement	Resources and Strategy Directorate	Head of Procurement	Manage contractual arrangements with CRB private partners, organise procurement of staff-related services. Ensure consideration of Action Plan objectives in policy development.

Business Function	Directorate	Equality Lead	Key Functions
Operations	Service Delivery Directorate	Head of Operations	Manage relationships and service level agreements with police forces and other data sources. Implement the quality assurance framework and deal with conflict on personal and police information. Ensure consideration of Action Plan objectives in policy development.
Human Resources	Resources and Strategy Directorate	Senior Business Advisor/HR Projects Manager	Manage policy and processes on the recruitment, retention, promotion and training for all current and future CRB staff. Manage consultation and roll-out of performance management and associated systems. Ensure consideration of Action Plan objectives in policy development.
Business Development	Resources and Strategy Directorate	Head of Business Development	Manage the development of business activity including the implementation of the Vetting and Barring Scheme, e-channels, IPLX and other associated projects. Ensure consideration of Action Plan objectives in policy development.

Business Function	Directorate	Equality Lead	Key Functions
Communications	Service Delivery Directorate	Head of External Communications/ Head of Internal Communications	Manage press notices, consultations, communications with the Registered Body network and media handling. Manage internal communications on business development and service change to ensure compliance and understanding by staff. Ensure consideration of action plan objectives in policy development.

## 8. Data Capture

The Equality Action Plans attached to this Scheme indicate a strong commitment from the CRB to review, regularise and improve current provisions in relation to the capture and monitoring of data relevant to disability, race and gender equality groups as relevant to CRB service delivery. This includes the following broad objectives:

- To review the processes for data capture via Equality Monitoring Forms, questionnaires and other communication tools to ensure voluntary provision from employees of sensitive equality-related data to inform policy design
- To review the processes for data capture via the Disclosure Application Form and other external communication tools to increase the available equality-related data from external customer groups. This may include incorporation of data capture opportunities into e-services developments such as online disclosure applications.

Data on the configuration and status of employees will continue to be managed by the Human Resources Transactions Team and in relation to external customer groups by the Management Information Service.

Data available to the Agency will be considered by the Equality Forum and senior managers conducting Initial or Full Impact Assessments of existing or developing business activity.

The Equality Action Plans also demonstrate a commitment by the CRB to ensuring that it seeks to attain the wider Home Office targets relating to the recruitment, retention and promotion of staff from disability, race and gender equality groups. This includes the employment targets relevant to black and minority ethnic groups in terms of employment and career progression under the Home Office Ten Year Target introduced in 1999.

Additional information on the detail of the targets is available separately from the CRB Human Resources Business Advisors' Team.

The CRB will also react flexibly to any new targets introduced by the Home Office in relation to the recruitment, retention and promotion of persons from disability, sex and transgender equality groups.

## 9. The Action Plans

The specific Action Plans for each of the equality strands covered by the Disability, Race and Gender Equality Scheme are attached at the close of this Scheme.

The Action Plans are representative of the CRB current and intended commitment to review, assess, refine and impact assess CRB business activity to ensure parity of service delivery to all customer groups in line with the current statutory provisions.

Implementation of the Action Plans will be managed by the specified post-holders identified for each objective.

The CRB Equality Forum will continue to take overall responsibility for ensuring the effective and timely implementation of the objectives in line with the review processes outlined at section 2.4.

# 10. Enquiries

Enquiries on the content of this Scheme should be addressed in the elected format to:

Jonathan Devereux  
Policy Manager  
Criminal Records Bureau  
Shannon Court  
10 Princes Parade  
Liverpool L3 1QY  
Tel: 0151 676 1522  
Fax: 0151 676 1731  
Email: [jonathan.devereux@crb.gsi.gov.uk](mailto:jonathan.devereux@crb.gsi.gov.uk)

# 11. Publications

## 11.1 The Scheme

This Scheme will be published on the CRB website in the following languages:

**English**

**Welsh**

Hard copies of the Scheme will be made available on request. Annual Reviews of the Scheme and the associated Action Plans will be published on the CRB website.

Hard copies of the Reviews will be made available on request.

## 11.2 Impact Assessments

The Equality Forum will publish the results of Initial and Full Impact Assessments on the CRB website in accordance with the Forum's Terms of Reference.

Hard copies of the results or full text versions of the Assessments will be made available on request.

# 12. Summary of Key Legislative Provisions

## The Race Relations Act 1976 (as amended)

The CRB must, in carrying out its functions, have due regard to the need to:-

- eliminate unlawful racial discrimination, and;
- promote equality of opportunity and good relations between persons of different racial groups.

**Definition of Race:** Discrimination by reason of race, colour, nationality (including citizenship), ethnic or national origins.

## The Disability Discrimination Act 1995 (as amended)

The CRB must, in carrying out its functions, have due regard to the need to:-

- promote equality of opportunity between disabled people and other people;
- eliminate discrimination which is unlawful under the Act;
- eliminate harassment of disabled people that is related to their disability;
- promote positive attitudes towards disabled people;
- encourage participation by disabled people in public life; and
- take steps to take account of disabled people's disabilities even where this involves treating disabled people more favourably than other people.

**Definition of Disability:** A physical or mental impairment which has a substantial or long-term adverse effect on a person's ability to carry out normal day-to-day activities.

## The Equality Act 2006

The CRB must, in carrying out its functions, have due regard to:-

- eliminating unlawful discrimination and harassment; and
- promoting equality of opportunity between men and women.

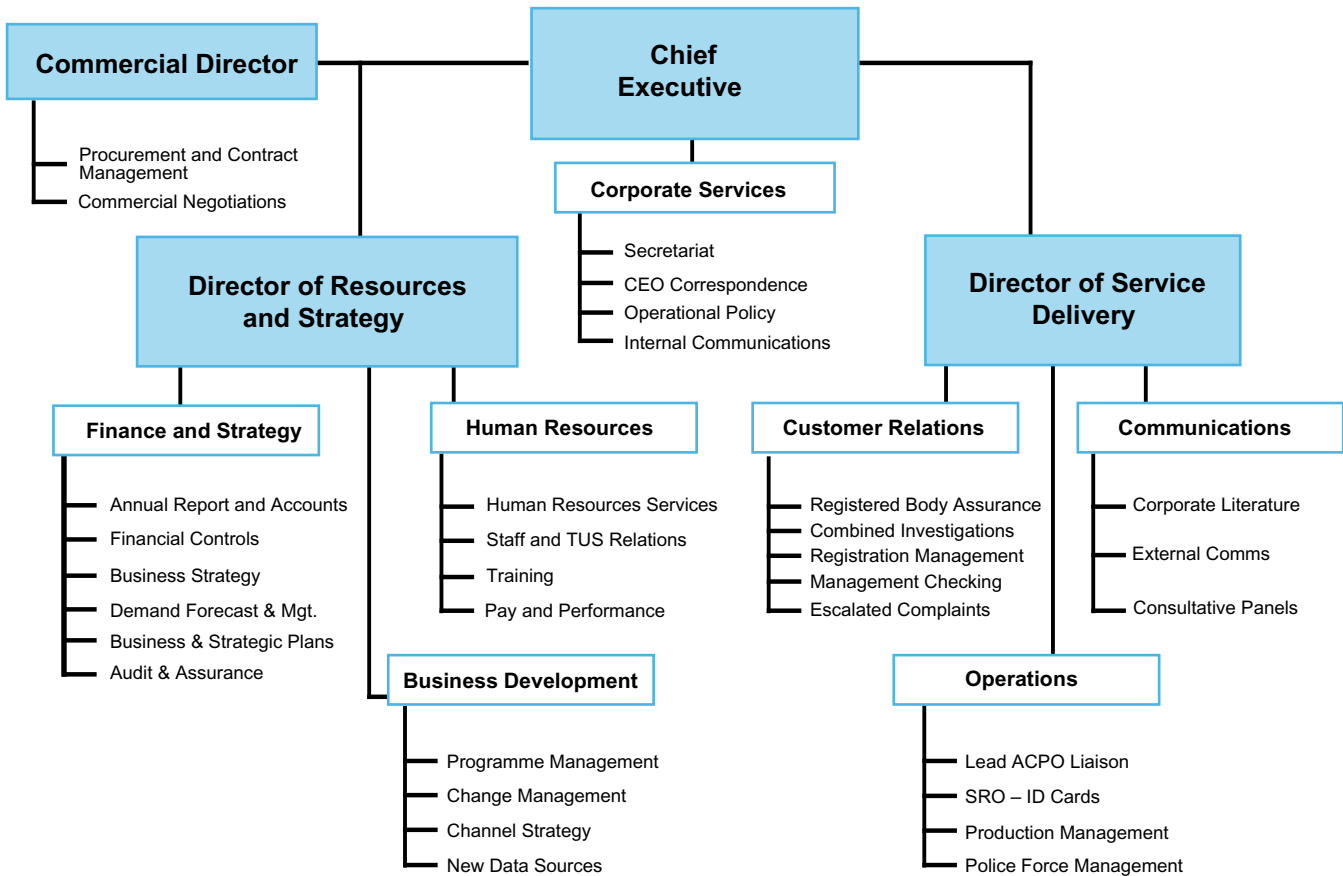
**Definition of Gender:** The word gender in the Equality Act refers to men and women. A male-to-female/female-to-male transsexual person is recognised as a woman/man for all purposes in law. The law defines transsexual people as those undergoing, intending to undergo, or having already undergone gender reassignment.

# 13. CRB Corporate Management Structure



Criminal Records Bureau

## CRB Management Responsibilities



# 14. CRB Disability Equality Action Plan

## 1. Leadership

Reference	Objective	Outcome	Implementation	Target	Owner
1.1	To ensure director-level ownership of the Action Plan and prioritisation of its implementation through the decision-making of the Executive Team and the Management Board	Ensures compliance with statutory obligations and achievement of corporate objectives	Through regular and focused consideration of the Action Plan by the Executive Team and other senior management forums	Current	Director of Resources and Strategy
1.2	To ensure direct communication of Action Plan requirements and objectives with senior managers in each business area	Active understanding of Action Plan and objectives	Use of communication tools (e.g. briefings/presentations/circulars) to target audience	1 June 2007	Director of Resources and Strategy and Equality Forum
1.3	To ensure that senior managers address the specific requirements of the Action Plan relevant to their business area	Commence implementation of Action Plan and objectives	Through the CRB Equality Forum and its monitoring arrangements	1 July 2007	Director of Resources and Strategy and Equality Forum

Reference	Objective	Outcome	Implementation	Target	Owner
1.4	To ensure ongoing monitoring of the implementation of the Action Plan in the medium term	Identification of non-compliance with Action Plan requirements	Through the CRB Equality Forum and via reporting mechanism to the Executive Team	Current	Director of Resources and Strategy and Equality Forum
1.5	To ensure ongoing Agency understanding of legislative requirements and changes	Update Action Plan to reflect new requirements	Policy analysis, liaison with Home Office Gender Diversity Action Team	Current	Head of Policy
1.6	To undertake an Annual Review of the progress of the Action Plan objectives	Ensures proactive implementation of Action Plan in line with CRB requirements	CRB Equality Forum will undertake annual review twelve months after implementation of the Action Plan	Annually	Head of Internal Audit

## 2. Analysis and Impact Assessment of Business Activity

Reference	Objective	Outcome	Implementation	Target	Owner
2.1	To identify the target business activities under development for review and impact assessment under the specific duty	To ensure that current activities under development consider the potential for adverse gender impact	Via gap analysis of business functions through the CRB Equality Forum in consultation with senior managers	Current – as business activity develops	CRB Equality Forum
2.2	To identify the existing business activities for review and impact assessment under the specific duty	To ensure that current activities are reviewed for adverse gender impact	Via gap analysis of business functions through the CRB Equality Forum in consultation with senior managers	September 2007	CRB Equality Forum
2.3	Invocation of Initial Impact Assessment process for business activities in development	To identify adverse gender impact (if any) and the requirement for Full Impact Assessment	By senior managers of each key business function in line with CRB Guidance	Immediate for activities in development	Senior Managers, with approvals by CRB Equality Forum
2.4	Invocation of Full Impact Assessment process for business activities in development	To identify whether the adverse impact should be mitigated, the activity should be refined or the impact can be objectively justified in line with business requirements	By senior managers of each key business function in line with CRB Guidance	Ongoing dependent on the outcomes of the Initial Impact Assessment process	Senior Managers, with approvals by CRB Equality Forum
2.5	Invocation of Initial Impact Assessment process for existing business activities	To identify adverse disability impact (if any) and the requirement for Full Impact Assessment	By senior managers of each key business function in line with CRB Guidance	December 2007	Senior Managers, with approvals by CRB Equality Forum

Reference	Objective	Outcome	Implementation	Target	Owner
2.6	Invocation of Full Impact Assessment process for existing business activities	To identify whether the adverse impact should be mitigated, the activity should be refined or the impact can be objectively justified in line with business requirements	By senior managers of each key business function in line with CRB Guidance	Ongoing dependent on the outcomes of the Initial Impact Assessment process after December 2007	Senior Managers, with approvals by CRB Equality Forum
2.7	To undertake an annual review of decisions approved by the CRB Equality Forum	To ensure that decisions taken can be maintained in the face of changes in business requirements or customer groups	Via analysis of available MIS data e.g. complaints, queries and by inviting representations from the Commission for Equality and Human Rights	Annually following implementation of the Action Plan on 1 May 2007	Head of Internal Audit and CRB Equality Forum

Reference	Objective	Outcome	Implementation	Target	Owner
2.8	<p>To ensure that data captured via the Management Information Support (MIS) Team and HR Transactions data on the configuration of the CRB customer base is comprehensive to enable use in the initial and full impact assessment processes</p>	<p>Ensures that hidden adverse equality impact is identified across internal and external customer groups via the analysis of accurate qualitative data</p>	<p>By reviewing and revising current arrangements to ensure that there is accurate data capture on all customer groups through the Disclosure Application Form, Equality Monitoring Forms and customer questionnaires (where relevant).</p> <p>Other incidental data made available via the review of service delivery to the Equality Forum may also be utilised.</p>	<p>Immediate</p>	<p>HR Transaction Manager</p>

### 3. Human Resources Business Activity

#### 3.1 Recruitment and Retention

Reference	Objective	Outcome	Implementation	Target	Owner
3.1.1	To ensure that the CRB values its disabled employees and increases the number of disabled people that it employs as a Disability Symbol employer	Positive promotion of the general disability equality duty	<ol style="list-style-type: none"> <li>1. By offering a guaranteed job interview for those applicants who meet the minimum essential requirements for a job opportunity</li> <li>2. By ensuring that all internal and external campaigns will continue to carry the Disability symbol and the Equal Opportunities Statement</li> </ol>	Current	HR Transactions Manager

Reference	Objective	Outcome	Implementation	Target	Owner
3.1.2	To ensure that internal promotion/development opportunities are brought to the attention of all customer groups through comprehensive communication channels	To identify discrimination in the opportunities offered for training and development to customer groups	<ol style="list-style-type: none"> <li>1. Review existing advertising methods to discuss accessibility by all customer groups within Agency</li> <li>2. Review internal selection processes to ensure removal of disability bias</li> <li>3. Ensure ongoing use of representative selection panels</li> </ol>	<p>December 2007</p> <p>December 2007</p> <p>Current</p>	HR Business Advisors Team

Reference	Objective	Outcome	Implementation	Target	Owner
3.1.3	<p>To ensure that workstation assessments are undertaken for all staff on a regular basis to meet changes in role, responsibilities and health/physical requirements</p> <p>To ensure that occupational health assessments are available to prospective and existing employees to enable the identification of any required reasonable adjustments to the working environment to support individuals</p>	<p>Ensure that prompt reasonable adjustments can be implemented to enhance working environment and enable full performance of duties</p>	<ol style="list-style-type: none"> <li>1. By monitoring the number of workstation assessments in line with induction and health and safety procedures</li> <li>2. Provide awareness training for new managers to identify the need for full workstation assessments</li> <li>3. Provide on-site occupational health services to the workforce (and prospective employees) on a regular basis to identify underlying health conditions, identification of disabilities under the DDA and the need for reasonable adjustments</li> </ol>	<p>Immediate</p> <p>Immediate</p> <p>Current</p>	<p>Health and Safety Manager</p> <p>HR Business Advisors Team</p> <p>HR Business Advisors Team through relevant referrals</p>

Reference	Objective	Outcome	Implementation	Target	Owner
3.1.4	Ensure comprehensive access to the Agency site and all facilities by disabled persons	Ensures DDA requirements are addressed	Ongoing consideration and reasonable adjustments by the Health and Safety Forum	Ongoing	Health and Safety Manager/Facilities Management
3.1.5	To ensure that exit interviews are offered to all leavers. The information gathered will inform statistical collation and monitoring	Allows Agency to identify reasons for leaving relevant to disability equality, e.g. staff management and development. Allows Agency to review and improve activities in response	<p>1. Ensure that managers use existing guidance to conduct exit interviews. Provide additional training where required</p> <p>2. Monitor and review the uptake of exit interviews and data relevant to disability groups</p>	Immediate and ongoing	HR Business Advisors Team

Reference	Objective	Outcome	Implementation	Target	Owner
3.1.6	<p>To ensure that the Agency:</p> <ol style="list-style-type: none"> <li>1. Collates statistical information on the configuration of the workforce</li> <li>2. Collates statistical information on the use and success of the Guaranteed Interview Scheme</li> <li>3. Collates information on the successful or unsuccessful promotion of internal staff from a disability perspective</li> <li>4. Collates information on the uptake and outcomes of exit interviews relevant to disability</li> </ol>	<p>Allows for review and refinement of business activity and processes in response to negative indicators</p>	<ol style="list-style-type: none"> <li>1. Ensure appropriate reporting mechanisms are in place by integrating existing data sources into a multi-purpose database</li> <li>2. Consider cost and implementation of the new system requirements and requirements for development in the short term</li> <li>3. Ensure that line managers accurately provide relevant information and data to HR function</li> </ol>	<p>Immediate</p>	<p>HR Transactions Manager</p> <p>HR Projects Manager</p> <p>HR Transactions Manager</p>

## 40 3.2 Staff Development and Training

Reference	Objective	Outcome	Implementation	Target	Owner
3.2.1	To review the existing Performance Management arrangements	Ensure that the arrangements are appropriate for all user groups	<ol style="list-style-type: none"> <li>1. Conduct pilot implementation of new performance management system</li> <li>2. Undertake comprehensive review and consultation with all user groups</li> <li>3. Refine system as appropriate to ensure full accessibility by all groups</li> </ol>	January 2008	HR Projects Manager
3.2.2	Ensure effective and accurate implementation of the performance management arrangements to all user groups	To identify discrimination in the performance management process	<ol style="list-style-type: none"> <li>1. By accurate collation of statistical data on performance management outcomes and relevance to disability</li> <li>2. Comparison with outcomes for non-disability relevant groups</li> <li>3. Training provision to staff to ensure understanding of performance management requirements</li> </ol>	Ongoing	<p>HR Business Advisors Team/HR Projects Manager</p> <p>HR Business Advisors Team</p> <p>HR Business Advisors Team</p>

Reference	Objective	Outcome	Implementation	Target	Owner
3.2.3	To ensure that all development opportunities are equally available to all customer groups	To identify discrimination in the opportunities offered for training and development to customer groups	<p>1. Review the current arrangements for deputising/promotion/temporary promotion/training opportunities to ensure fair access to users with a disability</p> <p>2. By accurate collation of statistical data on outcomes of promotion and development opportunities and their relevance to disability</p>	January 2008	<p>HR Business Advisors Team</p> <p>HR Transactions Manager</p>

Reference	Objective	Outcome	Implementation	Target	Owner
3.2.4	To ensure that all staff understand current policy arrangements regarding discrimination, harassment and bullying within the Agency based on disability considerations	<p>To ensure that staff understand their rights and responsibilities in this arena</p> <p>To increase confidence in the Agency approach to discrimination, harassment and bullying (including informal resolution mechanisms)</p>	<p>1. Via formal management meetings with each business area and Trade Union representatives to discuss discrimination, harassment and bullying-related issues</p> <p>2. Formal training activities with staff at all grades to facilitate practical understanding of discrimination, harassment and bullying in the workplace relevant to disability</p> <p>3. Consider employee assistance requirements regarding counselling and need for contact arrangements</p>	<p>May 2007</p> <p>February 2008</p> <p>February 2008</p>	HR Business Advisors Team

Reference	Objective	Outcome	Implementation	Target	Owner
3.2.5	Disability training for line managers to raise awareness of DDA requirements and managing staff with recognised disabilities	Ensures DDA requirements are implemented and reasonable adjustments are made	<p>1. Training to be delivered with Occupational Health associates to all new line managers</p> <p>2. Consideration of requirements for refresher training where necessary for existing line managers</p> <p>3. HR Advisors and Occupational Health Advisors to provide ongoing support and advice to line managers and individuals on the specific requirements of individual staff members</p>	December 2007  January 2008  Ongoing	HR Business Advisors Team

Reference	Objective	Outcome	Implementation	Target	Owner
3.2.6	Ensure that the Health and Safety Advisor is fully trained and has appropriate facilities (First Aid Officers/ First Aid Room) to address needs of disabled persons (e.g. medication)	Meets duty of care requirements under health and safety legislation and facilitates appropriate support to enable full employment	<ol style="list-style-type: none"> <li>1. Training of Advisor is ongoing</li> <li>2. Facilities in place to facilitate employment will be maintained to required standards</li> <li>3. Health and Safety Forum to meet quarterly to address and resolve health and safety issues across the Agency</li> </ol>	Ongoing	Health and Safety Manager
3.2.7	Ensure that the Agency consults with external organisations such as Access To Work, Scope, Home Office Disability Support Network and provides contact information to employees	Ensures required changes to policy and processes are enacted	<ol style="list-style-type: none"> <li>1. Ongoing connection to Home Office website guidance</li> <li>2. Ensure line management awareness training includes information on representative groups/ forums</li> </ol>	Ongoing	Director of Resources and Strategy  HR Business Advisors Team

## 3.3 Staff Discipline and Grievance

Reference	Objective	Outcome	Implementation	Target	Owner
3.3.1	To ensure independent resources are employed to facilitate the effective management of investigations (from both internal and external stakeholders) into allegations of discrimination, harassment and bullying	Ensures objectivity and transparency in the investigation process	<ol style="list-style-type: none"> <li>1. Review current arrangement for deciding how investigations should be resourced</li> <li>2. Consider alignment to Home Office policy provisions</li> <li>3. Ensure monitoring of all investigations by the Human Resources function to identify organisational trends and requirements for policy/procedural change</li> </ol>	June 2007	<p>HR Business Advisors Team</p> <p>HR Projects Manager</p> <p>HR Business Advisors Team</p>
3.3.2	Provide support to investigation manager (policy, legal and procedural advice)	Ensures thoroughness of investigation and legal compliance with statutory provisions	<ol style="list-style-type: none"> <li>1. Consider sensitivities and detail of the case</li> <li>2. Identify required resources and timeframe</li> <li>3. Meet regularly with the investigator to identify requirements</li> </ol>	Current	HR Business Advisors Team

Reference	Objective	Outcome	Implementation	Target	Owner
3.3.3	<p>To ensure that the Agency collates appropriate statistical information on the reasons for employee grievances within the organisation</p> <p>To ensure that the reasons for employee grievances are addressed appropriately by Agency HR specialists</p>	To identify disability discrimination and take remedial action	<ol style="list-style-type: none"> <li>1. Ensure appropriate reporting mechanisms are in place by integrating existing data sources into a multi-purpose database</li> <li>2. Ensure that targeted training of individuals/business is implemented to address disability discrimination</li> <li>3. Raise the issue with the Equality Forum and senior managers to ensure focus on disability equality and identify requirements for policy/procedural change</li> </ol>	<p>Immediate</p> <p>Immediate</p> <p>Immediate</p>	<p>HR Transactions Manager</p> <p>HR Business Advisors Team</p> <p>HR Business Advisors Team</p>

## 3.4 External Customer Groups

Reference	Objective	Outcome	Implementation	Target	Owner
4.1	Review the development of an online facility to improve access to the CRB Disclosure Service for disabled persons	Will facilitate access to the Disclosure Service via proactive service refinement	Following service review of current and anticipated arrangements for online applications	December 2007	E-Channels Manager
4.2	Review current arrangements for access to the Disclosure Service. This should include review of: <ol style="list-style-type: none"> <li>1. Telephone Disclosure Application Forms</li> <li>2. Minicom service arrangements and availability</li> <li>3. Braille application forms</li> <li>4. Website access (including format and font size)</li> </ol>	Will facilitate access to the Disclosure Service via proactive service refinement	Through improvement of current services or introduction of new services as outlined to facilitate disabled persons' access	June 2007	Head of External Communications

Reference	Objective	Outcome	Implementation	Target	Owner
4.3	Review the requirements for consultation with representative groups on improving service provision for access to the Disclosure Service by disabled persons. Consult as required in relation to service improvements.	Will facilitate access to the Disclosure Service via proactive service refinement	Through improvement of current services or introduction of new services as outlined to facilitate disabled persons' access	June 2007	Head of External Communications
4.4	Review current arrangements for the capture of data on external customer groups to identify adverse disability equality impact and inform service improvements	Informs review or implementation of business activity	Via consideration of relevant data capture options including capture through the Disclosure Application Form Via consultation with the Registered Body network and representative groups	Immediate	Director of Resources and Strategy
4.6	Utilise customer feedback via complaints and other mechanisms to identify adverse disability equality impact and inform service improvements	Will facilitate access to the Disclosure Service via proactive service refinement	By putting in place monitoring systems to categorise complaints and enquiries relevant to race issues	Immediate	Head of Customer Relations

# 15. CRB Race Equality Action Plan

## 1. Leadership

Reference	Objective	Outcome	Implementation	Target	Owner
1.1	To ensure Director level ownership of the Action Plan and prioritisation of its implementation through the decision-making of the Executive Team and Management Board	Ensures compliance with statutory obligations and achievement of corporate objectives	Through regular and focused consideration of the Action Plan at the Executive Team and other senior management forums	Current	Director of Resources and Strategy
1.2	To ensure direct communication of Action Plan requirements and objectives with senior managers in each business area	Active understanding of Action Plan and objectives	Use of communication tools (e.g. briefings/presentations/circulars) to target audience	1 June 2007	Director of Resources and Strategy and Equality Forum
1.3	To ensure that senior managers address the specific requirements of the Action Plan relevant to their business area	Commence implementation of Action Plan and objectives	Through the CRB Equality Forum and its monitoring arrangements	1 July 2007	Director of Resources and Strategy and Equality Forum
1.4	To ensure ongoing monitoring of the implementation of the Action Plan in the medium term	Identification of non-compliance with Action Plan requirements	Through the CRB Equality Forum and via reporting mechanism to the Executive Team	Current	Director of Resources and Strategy and Equality Forum

Reference	Objective	Outcome	Implementation	Target	Owner
1.5	To ensure ongoing Agency understanding of legislative requirements and changes	Update Action Plan to reflect new requirements	Policy Analysis, liaison with Home Office Gender Diversity Action Team	Current	Head of Policy
1.6	To undertake an Annual Review of the progress of the Action Plan objectives	Ensures proactive implementation of Action Plan in line with CRB requirements	CRB Equality Forum will undertake annual review twelve months after implementation of the Action Plan	Annually	Head of Internal Audit

## 2. Analysis and Impact Assessment of Business Activity

Reference	Objective	Outcome	Implementation	Target	Owner
2.1	To identify the target business activities under development for review and impact assessment under the specific duty	To ensure that current activities under development consider the potential for adverse race impact	Via gap analysis of business functions through the CRB Equality Forum in consultation with senior managers	Current – as business activity develops	CRB Equality Forum
2.2	To identify the existing business activities for review and impact assessment under the specific duty	To ensure that current activities are reviewed for adverse race impact	Via gap analysis of business functions through the CRB Equality Forum in consultation with senior managers	September 2007	CRB Equality Forum
2.3	Invocation of Initial Impact Assessment process for business activities in development	To identify adverse race impact (if any) and the requirement for Full Impact Assessment	By senior managers of each key business function in line with CRB Guidance	Immediate for activities in development	Senior Managers, with approvals by CRB Equality Forum
2.4	Invocation of Full Impact Assessment process for business activities in development	To identify whether the adverse impact should be mitigated, the activity should be refined or the impact can be objectively justified in line with business requirements	By senior managers of each key business function in line with CRB Guidance	Ongoing dependent on the outcomes of the Initial Impact Assessment process	Senior Managers, with approvals by CRB Equality Forum

Reference	Objective	Outcome	Implementation	Target	Owner
2.5	Invocation of Initial Impact Assessment process for existing business activities	To identify adverse gender impact (if any) and the requirement for Full Impact Assessment	By senior managers of each key business function in line with CRB Guidance	December 2007	Senior Managers, with approvals by CRB Equality Forum
2.6	Invocation of Full Impact Assessment process for existing business activities	To identify whether the adverse impact should be mitigated, the activity should be refined or the impact can be objectively justified in line with business requirements	By senior managers of each key business function in line with CRB Guidance	Ongoing dependent on the outcomes of the Initial Impact Assessment process after December 2007	Senior Managers, with approvals by CRB Equality Forum

Reference	Objective	Outcome	Implementation	Target	Owner
2.7	To undertake an annual review of decisions approved by the CRB Equality Forum	To ensure that decisions taken can be maintained in the face of changes in business requirements or customer groups	Via analysis of available MIS data e.g. complaints, queries and by inviting representations from the Commission for Equality and Human Rights	Annually following implementation of the Action Plan 01.05.07	Head of Internal Audit and CRB Equality Forum
2.8	To ensure that data captured via the Management Information Support (MIS) Team and HR Transactions data on the configuration of the CRB customer base is comprehensive to enable use in the initial and full impact assessment processes	Ensures that hidden adverse equality impact is identified across internal and external customer groups via the analysis of accurate qualitative data	By reviewing and revising current arrangements to ensure that there is accurate data capture on all customer groups through the Disclosure Application Form, Equality Monitoring Forms and customer questionnaires (where relevant).  Other incidental data made available via the review of service delivery to the Equality Forum may also be utilised.	Immediate	HR Transaction Manager

## 3. Human Resources Business Activity

### 3.1 Recruitment and Retention

Reference	Objective	Outcome	Implementation	Target	Owner
3.1.1	<p>To ensure that positive advertising to race groups in the community is considered for external recruitment campaigns for relevant CRB positions</p> <p>At least one in three external campaigns to involve positive advertising to a relevant race group via local communities and media tools</p>	<p>Positive promotion of the general race equality duty. Allows the workforce to become more representative of the local community</p>	<ol style="list-style-type: none"> <li>External campaign planning will consider appropriateness of targeted advertising</li> <li>All external campaigns will carry the Equal Opportunities Statement</li> <li>Consideration of current data on the configuration of the workforce and target groups will inform the decision taken to initiate positive advertising</li> <li>Identify the most appropriate advertising mechanism to achieve the objective</li> </ol>	Ongoing	HR Business Advisors Team

Reference	Objective	Outcome	Implementation	Target	Owner
3.1.2	To ensure that internal promotion/development opportunities are brought to the attention of all customer groups through comprehensive communication channels	To identify discrimination in the opportunities offered for training and development to race groups	<ol style="list-style-type: none"> <li>1. Review existing advertising methods to discuss accessibility by all customer groups within Agency</li> <li>2. Review internal selection processes to ensure removal of racial bias</li> <li>3. Ensure ongoing use of representative selection panels</li> </ol>	<p>December 2007</p> <p>December 2007</p> <p>Current</p>	HR Business Advisors Team
3.1.3	To ensure that exit interviews are offered to all leavers. Information gathered to inform statistical collation and monitoring.	Allows Agency to identify reasons for leaving relevant to race equality, e.g. staff management and development. Allows Agency to review and improve activities in response.	<ol style="list-style-type: none"> <li>1. Ensure that managers use existing guidance to conduct exit interviews. Provide additional training where required.</li> <li>2. Monitor and review the uptake of exit interviews and data relevant to race groups</li> </ol>	Immediate and ongoing	HR Business Advisors Team

Reference	Objective	Outcome	Implementation	Target	Owner
3.1.4	<p>To ensure that the Agency:</p> <ol style="list-style-type: none"> <li>1. Collates statistical information on the configuration of the workforce</li> <li>2. Collates statistical information on positive advertising and resulting success</li> <li>3. Collates information on the successful or unsuccessful promotion of internal staff from relevant race groups</li> <li>4. Collates information on the uptake and content of exit interviews relevant to race groups</li> </ol>	<p>Allows for review and refinement of business activity and processes in response to negative indicators</p>	<ol style="list-style-type: none"> <li>1. Ensure appropriate reporting mechanisms are in place by integrating existing data sources into a multi-purpose database</li> <li>2. Consider cost and implementation of the new system requirements and requirements for development in the short term</li> <li>3. Ensure that line managers accurately provide relevant information and data to HR function</li> </ol>	<p>Immediate</p>	<p>HR Transactions Manager</p> <p>HR Projects Manager</p> <p>HR Transactions Manager</p>

## 3.2 Staff Development and Training

Reference	Objective	Outcome	Implementation	Target	Owner
3.2.1	To review the existing Performance Management arrangements	Ensure that the arrangements are appropriate for all user groups including race relevant groups	<ol style="list-style-type: none"> <li>1. Conduct pilot implementation of new performance management system</li> <li>2. Undertake comprehensive review and consultation with all user groups</li> <li>3. Refine system as appropriate to ensure full accessibility by all groups</li> </ol>	January 2008	HR Projects Manager
3.2.2	Ensure effective and accurate implementation of the performance management arrangements to all user groups	To identify discrimination in the performance management process	<ol style="list-style-type: none"> <li>1. By accurate collation of statistical data on performance management outcomes and relevance to race groups</li> <li>2. Comparison with outcomes for non race-relevant groups</li> <li>3. Training provision to staff to ensure understanding of performance management requirements</li> </ol>	December 2007	HR Business Advisors Team  HR Business Advisors Team  HR Business Advisors Team



Reference	Objective	Outcome	Implementation	Target	Owner
3.2.4	To ensure that all staff understand current policy arrangements regarding discrimination, harassment and bullying within the Agency based on race considerations	<p>To ensure that staff understand their rights and responsibilities in this arena.</p> <p>To increase confidence in the Agency approach to discrimination, harassment and bullying (including informal resolution mechanisms).</p>	<p>1. Via formal management meetings with each business area and Trade Union representatives to discuss bullying and harassment and related issues</p> <p>2. Formal training activities with staff at all grades to facilitate practical understanding of discrimination, harassment and bullying in the workplace</p> <p>3. Consider employee assistance requirements regarding counselling and need for contact arrangements</p>	<p>May 2007</p> <p>February 2008</p> <p>February 2008</p>	HR Business Advisors Team

### 3.3 Staff Discipline and Grievance

Reference	Objective	Outcome	Implementation	Target	Owner
3.3.1	To ensure independent resources are employed to facilitate the effective management of investigations (from both internal and external stakeholders) into allegations of discrimination, harassment and bullying	Ensures objectivity and transparency in the investigation process	<ol style="list-style-type: none"> <li>1. Review current arrangement for deciding how investigations should be resourced</li> <li>2. Consider alignment to Home Office policy provisions</li> <li>3. Ensure monitoring of all investigations by the Human Resources function to identify organisational trends and requirements for policy/procedural change</li> </ol>	June 2007	<p>HR Business Advisors Team</p> <p>HR Projects Manager</p> <p>HR Business Advisors Team</p>

Reference	Objective	Outcome	Implementation	Target	Owner
3.3.2	Provide support to investigation manager (policy, legal and procedural advice)	Ensures thoroughness of investigation and legal compliance with statutory provisions	<ol style="list-style-type: none"> <li>1. Consider sensitivities and detail of the case</li> <li>2. Identify required resources and timeframe</li> <li>3. Meet regularly with the investigator to identify requirements</li> </ol>	Ongoing	HR Business Advisors Team

Reference	Objective	Outcome	Implementation	Target	Owner
3.3.3	<p>To ensure that the Agency collates appropriate statistical information on the reasons for employee grievances within the organisation</p> <p>To ensure that the reasons for grievances are addressed appropriately by Agency HR specialists</p>	To identify race discrimination and take remedial action	<ol style="list-style-type: none"> <li>1. Ensure appropriate reporting mechanisms are in place by integrating existing data sources into a multi-purpose database</li> <li>2. Ensure that targeted training of individuals/business is implemented to address race discrimination</li> <li>3. Raise the issue with the Equality Forum and senior managers to ensure focus on race equality and identify requirements for policy/procedural change</li> </ol>	<p>Immediate</p> <p>Immediate</p> <p>Immediate</p>	<p>HR Transactions Manager</p> <p>HR Business Advisors Team</p> <p>HR Business Advisors Team</p>

## 4 External Customer Groups

Reference	Objective	Outcome	Implementation	Target	Owner
4.1	Review current arrangements for the capture of data on external customer groups to identify adverse race equality impact and inform service improvements	Informs review or implementation of business activity	Via consideration of relevant data capture options including capture through the Disclosure Application Form Via consultation with the Registered Body network and representative groups	Immediate	Director of Resources and Strategy
4.2	Review the current arrangements for the publication and provision of the Disclosure Application form in alternative languages	Will facilitate access to the Disclosure Service via proactive service refinement	Via analysis of relevant data capture and relevant consultation with the Registered Body network and representative groups	Immediate	Head of External Communications
4.3	Utilise customer feedback via complaints and other mechanisms to identify adverse race equality impact and inform service improvements	Will facilitate access to the Disclosure Service via proactive service refinement	By putting in place monitoring systems to categorise complaints and enquiries relevant to race issues	Immediate	Head of Customer Relations

Reference	Objective	Outcome	Implementation	Target	Owner
4.4	Maintain current service delivery objectives and performance indicators for the CRB Welsh Language Service	Ensures parity of service delivery to Welsh Groups under the Welsh Language Act 1993	Via consistent and ongoing implementation of the CRB Welsh Language Scheme	Immediate	Head of External Communications
4.5	Review the requirements for consultation with representative groups on improving service provision for access to the Disclosure Service by race groups. Consult as required in relation to service improvements	Will facilitate access to the Disclosure Service via proactive service refinement	Through improvement of current services or introduction of new services as outlined to facilitate by race groups access	June 2007	Head of External Communications

# 16. CRB Gender Equality Action Plan

## 1. Leadership

Reference	Objective	Outcome	Implementation	Target	Owner
1.1	To ensure Director level ownership of the Action Plan and prioritisation of its implementation through the decision-making of the Executive Team and the Management Board	Ensures compliance with statutory obligations and achievement of corporate objectives	Through regular and focused consideration of the Action Plan at the Executive Team and other senior management forums	Current	Director of Resources and Strategy
1.2	To ensure direct communication of Action Plan requirements and objectives with senior managers in each business area	Active understanding of Action Plan and objectives	Use of communication tools (e.g. briefings/presentations/circulars) to target audience	1 June 2007	Director of Resources and Strategy and Equality Forum
1.3	To ensure that senior managers address the specific requirements of the Action Plan relevant to their business area	Commence implementation of Action Plan and objectives	Through the CRB Equality Forum and its monitoring arrangements	1 July 2007	Director of Resources and Strategy and Equality Forum

Reference	Objective	Outcome	Implementation	Target	Owner
1.4	To ensure ongoing monitoring of the implementation of the Action Plan in the medium term	Identification of non-compliance with Action Plan requirements	Through the CRB Equality Forum and via reporting mechanism to the Executive Team	Current	Director of Resources and Strategy and Equality Forum
1.5	To ensure ongoing Agency understanding of legislative requirements and changes	Update Action Plan to reflect new requirements	Policy Analysis, liaison with Home Office Gender Diversity Action Team	Current	Head of Policy
1.6	To undertake an Annual Review of the progress of the Action Plan objectives	Ensures proactive implementation of Action Plan in line with CRB requirements	CRB Equality Forum will undertake annual review twelve months after implementation of the Action Plan	Annually	Head of Internal Audit

## 2. Analysis and Impact Assessment of Business Activity

Reference	Objective	Outcome	Implementation	Target	Owner
2.1	To identify the target business activities under development for review and impact assessment under the specific duty	To ensure that current activities under development consider the potential for adverse gender impact	Via gap analysis of business functions through the CRB Equality Forum in consultation with senior managers	Current – as business activity develops	CRB Equality Forum
2.2	To identify the existing business activities for review and impact assessment under the specific duty	To ensure that current activities are reviewed for adverse gender impact	Via gap analysis of business functions through the CRB Equality Forum in consultation with senior managers	September 2007	CRB Equality Forum
2.3	Invocation of Initial Impact Assessment process for business activities in development	To identify adverse gender impact (if any) and the requirement for Full Impact Assessment	By senior managers of each key business function in line with CRB Guidance	Immediate for activities in development	Senior Managers, with approvals by CRB Equality Forum
2.4	Invocation of Full Impact Assessment process for business activities in development	To identify whether the adverse impact should be mitigated, the activity should be refined or the impact can be objectively justified in line with business requirements	By senior managers of each key business function in line with CRB Guidance	Ongoing dependent on the outcomes of the Initial Impact Assessment process	Senior Managers, with approvals by CRB Equality Forum

Reference	Objective	Outcome	Implementation	Target	Owner
2.5	Invocation of Initial Impact Assessment process for existing business activities	To identify adverse gender impact (if any) and the requirement for Full Impact Assessment	By senior managers of each key business function in line with CRB Guidance	December 2007	Senior Managers, with approvals by CRB Equality Forum
2.6	Invocation of Full Impact Assessment process for existing business activities	To identify whether the adverse impact should be mitigated, the activity should be refined or the impact can be objectively justified in line with business requirements	By senior managers of each key business function in line with CRB Guidance	Ongoing dependent on the outcomes of the Initial Impact Assessment process after December 2007	Senior Managers, with approvals by CRB Equality Forum
2.7	To undertake an annual review of decisions approved by the CRB Equality Forum	To ensure that decisions taken can be maintained in the face of changes in business requirements or customer groups	Via analysis of available MIS data e.g. complaints, queries and by inviting representations from the Commission for Equality and Human Rights	Annually following implementation of the Action Plan 01 May 2007	Head of Internal Audit and CRB Equality Forum

Reference	Objective	Outcome	Implementation	Target	Owner
2.8	To ensure that data captured via the Management Information Support (MIS) Team and HR Transactions data on the configuration of the CRB customer base is comprehensive to enable use in the initial and full impact assessment processes	Ensures that hidden adverse equality impact is identified across internal and external customer groups via the analysis of accurate qualitative data	By reviewing and revising current arrangements to ensure that there is accurate data capture on all customer groups through the Disclosure Application Form, Equality Monitoring Forms and customer questionnaires (where relevant).  Other incidental data made available via the review of service delivery to the Equality Forum may also be utilised.	Immediate	HR Transaction Manager

## 3. Human Resources Business Activities

### 3.1 Recruitment and Retention

Reference	Objective	Outcome	Implementation	Target	Owner
3.1.1	To ensure that recruitment processes help the CRB attract a diverse and representative workforce and that any gender bias and barriers to the employment of transsexuals are identified and removed from the recruitment and selection procedures of the Agency	<p>Positive promotion of the general gender equality duty</p> <p>Increases the size of the recruitment and talent pool available to enhance the delivery of CRB services</p> <p>Ensures the workforce is reflective of society and in line with Home Office statistical targets</p>	<p>1. All campaigns will include the Equal Opportunities Statement</p> <p>2. Review current recruitment procedures in consultation with Home Office colleagues with a view to partial or full policy alignment</p> <p>3. Review current recruitment procedures in line with relevant Commission guidance to identify hidden or overt gender or transsexual bias</p>	<p>Ongoing</p> <p>February 2008</p> <p>February 2008</p>	HR Business Advisors Team

Reference	Objective	Outcome	Implementation	Target	Owner
3.1.1 (continued)			<p>4. Undertake rectification of procedures to enable unrestricted access to employment opportunities across gender groups</p> <p>5. Ensure ongoing use of representative selection panels</p>	<p>June 2008</p> <p>Current</p>	
3.1.2	To develop availability and use of flexible working options for male and female employees as part of maintaining an effective work-life balance for all employees	Ensures parity across gender groups in access to flexible working arrangements to respond to individual needs (e.g. care responsibilities)	<p>1. Anticipate and prepare for impact of Work and Families Bill 2006</p> <p>2. Ensure global awareness of access to the arrangements across the Agency</p>	<p>Immediate</p> <p>Immediate</p>	HR Business Advisors Team

Reference	Objective	Outcome	Implementation	Target	Owner
3.1.3	To ensure that internal promotion/development opportunities are brought to the attention of all customer groups through comprehensive communication channels	To identify discrimination in the opportunities offered for training and development to gender groups	<ol style="list-style-type: none"> <li>1. Review existing advertising methods to discuss accessibility by all customer groups within the Agency</li> <li>2. Review internal selection processes to ensure removal of gender bias</li> <li>3. Ensure ongoing use of representative selection panels</li> </ol>	<p>December 2007</p> <p>December 2007</p> <p>Current</p>	HR Business Advisors Team
3.1.4	To ensure that exit interviews are offered to all leavers. Where the interview is conducted for thorough information to be gathered in order to inform statistical collation and monitoring	Allows Agency to identify reasons for leaving relevant to gender equality, e.g. staff management and development. Allows Agency to review and improve activities in response	<ol style="list-style-type: none"> <li>1. Ensure that managers use existing guidance to conduct exit interviews. Provide additional training where required</li> <li>2. Monitor and review the uptake of exit interviews and data relevant to gender groups</li> </ol>	Immediate and ongoing	HR Business Advisors Team

Reference	Objective	Outcome	Implementation	Target	Owner
3.1.5	<p>To ensure that the Agency:</p> <ol style="list-style-type: none"> <li>1. Collates statistical information on the configuration of the workforce</li> <li>2. Collates statistical information on employees taking up the option of flexible working.</li> <li>3. Collates information on the successful or unsuccessful promotion of internal staff from relevant gender groups</li> <li>4. Collates information on the uptake and content of the exit interview relevant to gender groups</li> </ol>	Allows for review and refinement of business activity and processes in response to negative indicators	<ol style="list-style-type: none"> <li>1. Ensure appropriate reporting mechanisms are in place</li> <li>2. Consider cost and implementation of the new system requirements and requirements for development in the short term</li> <li>3. Ensure that line managers accurately provide relevant information and data to HR function</li> </ol>	Immediate	<p>HR Transactions Manager</p> <p>HR Projects Manager</p> <p>HR Transactions Manager</p>

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Reference	Objective	Outcome	Implementation	Target	Owner
3.2.1	To review the existing Performance Management arrangements	Ensure that the arrangements are appropriate for all user groups including gender groups	<ol style="list-style-type: none"> <li>1. Conduct pilot implementation of new performance management system</li> <li>2. Undertake comprehensive review and consultation with all user groups</li> <li>3. Refine system as appropriate to ensure full accessibility by all groups</li> </ol>	January 2008	HR Projects Manager

Reference	Objective	Outcome	Implementation	Target	Owner
3.2.2	Ensure effective and accurate implementation of the performance management arrangements to all user groups	To identify discrimination in the performance management process	<ol style="list-style-type: none"> <li>1. By accurate collation of statistical data on performance management outcomes and relevance to gender groups</li> <li>2. Comparison with outcomes for non-gender relevant groups</li> <li>3. Training provision to staff to ensure understanding of performance management requirements</li> </ol>	December 2007	<p>HR Business Advisors Team/ HR Transactions Manager</p> <p>HR Business Advisors Team</p> <p>HR Business Advisors Team</p>

Reference	Objective	Outcome	Implementation	Target	Owner
3.2.3	To ensure that all development opportunities are equally available to all customer groups	To identify discrimination in the opportunities offered for training and development to customer groups	<p>1. Review the current arrangements for deputising/promotion/temporary promotion/training opportunities to ensure fair access to gender relevant groups</p> <p>2. By accurate collation of statistical data on outcomes of promotion and development opportunities and their relevance to gender groups</p>	January 2008	<p>HR Business Advisors Team</p> <p>HR Transactions Manager</p>

Reference	Objective	Outcome	Implementation	Target	Owner
3.2.4	To ensure that all staff understand current policy arrangements regarding discrimination, harassment and bullying within the Agency based on gender considerations	<p>To ensure that staff understand their rights and responsibilities in this arena</p> <p>To increase confidence in the Agency approach to discrimination, harassment and bullying (including informal resolution mechanisms)</p>	<p>1. Via formal management meetings with each business area and Trade Union representatives to discuss bullying and harassment and related issues</p> <p>2. Formal training activities with staff at all grades to facilitate practical understanding of discrimination, harassment and bullying in the workplace</p> <p>3. Consider employee assistance requirements regarding counselling and need for contact arrangements</p>	<p>May 2007</p> <p>February 2008</p> <p>February 2008</p>	HR Business Advisors Team

Reference	Objective	Outcome	Implementation	Target	Owner
3.2.5	To ensure that discrimination against pregnant staff or staff returning from maternity leave (including for promotional opportunities) is not tolerated within the Agency	Ensures removal of sex discrimination alongside proactive promotion of flexible working arrangements and open promotional arrangements	<p>1. Introduce monitoring of feedback from pregnant/returning employees via use of standardised pro-forma at each stage. This may include incorporation into the Agency maternity procedures</p> <p>2. Initiate remedial action in response to negative indicators</p>	<p>January 2008</p> <p>Ongoing after January 2008</p>	HR Business Advisors/HR Projects Manager

## 3.3 Staff Discipline and Grievances

Reference	Objective	Outcome	Implementation	Target	Owner
3.3.1	To ensure independent resources are employed to facilitate the effective management of investigations (from both internal and external stakeholders) into allegations of discrimination, harassment and bullying	Ensures objectivity and transparency in the investigation process	<ol style="list-style-type: none"> <li>1. Review current arrangement for deciding how investigations should be resourced</li> <li>2. Consider alignment to Home Office policy provisions</li> <li>3. Ensure monitoring of all investigations by the Human Resources function to identify Agency trends and requirements for policy/procedural change</li> </ol>	June 2007	<p>HR Business Advisors Team</p> <p>HR Projects Manager</p> <p>HR Business Advisors Team</p>
3.3.2	Provide support to investigation manager (policy, legal and procedural advice)	Ensures thoroughness of investigation and legal compliance with statutory provisions	<ol style="list-style-type: none"> <li>1. Consider sensitivities and detail of the case</li> <li>2. Identify required resources and timeframe</li> <li>3. Meet regularly with the investigator to identify requirements</li> </ol>	Current	HR Business Advisors Team

Reference	Objective	Outcome	Implementation	Target	Owner
3.3.3	<p>To ensure that the Agency collates appropriate statistical information on the reasons for employee grievances within the Agency</p> <p>To ensure that the reasons for employee grievances are addressed appropriately by Agency HR specialists</p>	To identify gender discrimination and take remedial action	<ol style="list-style-type: none"> <li>1. Ensure appropriate reporting mechanisms are in place by integrating existing data sources into a multi-purpose database</li> <li>2. Ensure that targeted training of individuals/business is implemented to address gender discrimination</li> <li>3. Raise the issue with the Equality Forum and senior managers to ensure focus on gender equality and identify requirements for policy/procedural change</li> </ol>	<p>Immediate</p> <p>Immediate</p> <p>Immediate</p>	<p>HR Transactions Manager</p> <p>HR Business Advisors Team</p> <p>HR Business Advisors Team</p>

## 3.4 Equal Pay

Reference	Objective	Outcome	Implementation	Target	Owner
3.4.1	To ensure that the treatment of equal pay and pension considerations are dealt with in accordance with the wider Home Office steer as outlined in the Core DRG Scheme	Policy consistency across agencies for civil service employees	No direct implementation is required but the CRB will facilitate negotiations/consideration on this issue	Ongoing	Director of Resources and Strategy
3.4.2	To ensure the Agency pay system delivers equal pay regardless of gender and that systems are in place to monitor equality in the pay and reward arrangements	To identify any direct or indirect gender discrimination in the pay system	<ol style="list-style-type: none"> <li>1. To assess potential impact on gender in each round of pay negotiations</li> <li>2. To establish arrangements in consultation with the Home Office to support the invocation of regular equal pay reviews</li> </ol>	Ongoing	Director of Resources and Strategy

## 4. External Customer Groups

Reference	Objective	Outcome	Implementation	Target	Owner
4.1	To ensure that the current off-line arrangements for transgender applications to the Disclosure Service are maintained to ensure that discretion is maintained in the recruitment process with the relevant Registered Body	Recognises of transgender status whilst ensuring access to the Disclosure Application process	Via annual review of the off-line arrangements by the CRB Equality Forum	Ongoing	Head of Customer Relations
4.2	Review current arrangements for the capture of data on external customer groups to identify adverse disability equality impact and inform service improvements	Informs review or implementation of business activity	Via consideration of relevant data capture options including capture through the Disclosure Application Form Via consultation with the Registered Body network and representative groups	Immediate	Director of Resources and Strategy
4.3	Utilise customer feedback via complaints and other mechanisms to identify adverse gender equality impact and inform service improvements	Will facilitate access to the Disclosure Service via proactive service refinement	By putting in place monitoring systems to categorise complaints and enquiries relevant to gender issues	Immediate	Head of Customer Relations

Reference	Objective	Outcome	Implementation	Target	Owner
4.4	Review the requirements for consultation with representative groups on improving service provision for access to the Disclosure Service by gender groups. Consult as required in relation to service improvements	Will facilitate access to the Disclosure Service via proactive service refinement	Through improvement of current services or introduction of new services as outlined to facilitate access by gender groups	June 2007	Head of External Communications