

**Home Office Reform Action Plan**  
**Race Equality Impact Assessment**  
**Report**

**July 2006**

## Executive Summary

### **Background**

The Reform Action Plan for the Home Office sets out the compelling case for change in the organisation. The Plan commits to an ambitious programme of reforms across the department which are needed in order to bring about a step-change in performance. These are designed to enable the Home Office to meet public expectations and to deliver on its core purpose of protecting the public.

The reform programme contains a number of major work streams designed to transform the Home Office. The process will take two or more years to complete and relies on the commitment and stamina of everyone in the organisation.

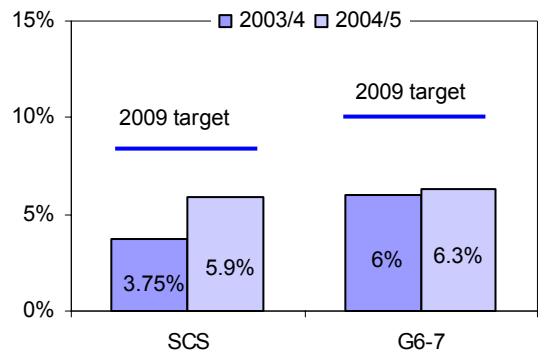
This report aims to identify areas of the reform plan that have the potential for adverse or positive impacts on race equality. This document highlights areas of the reform programme with potential race equality implications and signposts a set of actions for future work as a result. These actions will be built into the reform programme plan itself and will be subject to regular monitoring - progress on implementation, risk mitigation actions and benefits realisation will all be tracked.

### **Process**

#### Data

Work to develop the Reform Action Plan drew on the findings of the Capability Review and supporting research, Ministers' and the Home Office Board's assessment of what needed to be done, along with the views of staff and stakeholders from a range of sources including: visits, meetings, and electronic feedback channels. This assessment draws on this information, on existing HR and other data and on evidence from the equality impact assessment carried out in 2005 on the restructuring programme, including the proposal to reduce headquarters by 30%.

The HR data shows that although overall minority ethnic representation in the department is good, minority ethnic staff are not spread evenly across the grades. In the core Home Office over 6 in 10 (62%) minority ethnic staff work in the junior grades, (AA to EO) compared to less than 4 in 10 (39%) white staff. This is a slight improvement on last year when the proportions were 69% and 38%. In IND, which has a higher proportion of staff working in junior grades, 78% of minority ethnic staff work in the AA to EO grades compared to 70% of white staff. Again this is an improvement on the previous



year when the proportions were 92% and 76% for minority ethnic staff and white staff respectively.

\* figures taken from the annual diversity and Equal opportunities Report 2004/5

### Engagement

The Reform Action Plan impacts both on our internal staff and our stakeholders and we are committed to consulting and engaging with them as we take the reform process forward. A number of actions have already been completed or committed to as part of this process including:

- To ensure race equality issues are built into plans to engage more effectively with external stakeholders, working with the Home Office's Race Equality Adviser on building communications and engagement capability.
- To develop and deploy an inclusive staff engagement strategy ensuring that feedback is captured and acted on.
- There is a commitment from the Permanent Secretary down through the organisation that the key elements of the plan will be discussed face to face with staff. Managers will be accountable for doing this and measured through the staff survey and other feedback systems.
- An initial meeting with staff networks is due to be scheduled shortly. Further consultation is planned with these groups and will be ongoing throughout the reform programme.
- Initial meeting with Trade Unions has taken place and commitment to engage as process taken forward.

### **Assessment**

Key findings:

- There is a potential for the further headcount reduction target to have a disproportionate impact on minority ethnic staff. The existing equality impact assessment carried out for the 30% headcount reduction target needs to be revisited in light of the extra 10% headcount reduction commitment and in light of the additional data now available.
- If groups of posts are relocated, or redeployed, an assessment of the diversity of these specific groups must be carried out and assessed for adverse impacts.
- A full race equality impact assessment (REIA) will be required for changes to recruitment, selection and promotion systems and for the new reward framework, to ensure the system does not discriminate against minority ethnic groups.
- A full REIA will be required on any new talent management system to ensure the proposals do not have potential to discriminate against minority ethnic groups and to ensure it is in line with objectives on supporting leaders in under represented groups.

- There are opportunities to ensure minority ethnic staff are aware of, and benefit proportionately from, new development opportunities. Measures are being looked at to improve the response rate from employees on diversity information in support of this.
- The reform programme presents opportunities to improve the range and quality of our engagement with our stakeholders and to strengthen our approach to race equality as part of our work to improve programme management across the organisation.

Annex A gives further details of the assessment, together with proposed actions.

## **Conclusion**

We will be including the actions identified as a result of this assessment in the reform programme plan with clear dates for completion. We are also building REIAs into our reform work stream on ensuring more effectively managed programmes. This report has highlighted some areas where full REIAs will be required on the more detailed proposals of some of the reform strands. These will be carried out and completed before these actions are implemented. We will consult widely internally and externally both as part of these assessments and more generally as we go forward with our reform programme. We will report on progress periodically.

Note: Following publication of the Home Office Reform Action Plan we will shortly be publishing two further documents, along with their respective REIAs: a rebalancing of the Criminal Justice System; and a fundamental review of the Immigration and Nationality Directorate.

## **Annex A**

### **HO REFORM ACTION PLAN: FROM IMPROVEMENT TO TRANSFORMATION: RACE EQUALITY IMPACT ASSESSMENT (REIA)**

An ambitious and wide ranging plan to transform the Home Office by its nature presents opportunities and possible risks for race equality. In implementing our Reform Action Plan we are determined to make the most of the positive opportunities and to mitigate potential risks. This document is concerned with race equality impacts but as we move forward we will also be carrying out a broader equality impact assessment. The Reform Action Plan published on 19 July is a high level plan showing a broad direction of travel and key milestones. This is supported by a more comprehensive implementation programme which is under development. There is more work to be done to flesh out the detail on this and as an integral part of our approach to implementation we will actively engage our staff and stakeholders in this process and to do this inclusively. We have already started to engage with these groups and we will ensure we continue this dialogue. Alongside this engagement strategy, we are also integrating monitoring of equality impacts into our programme management arrangements. Following publication of the Home Office Reform Plan we will shortly be publishing two further

documents, along with their respective REIAs: a rebalancing of the Criminal Justice System; and a fundamental review of the Immigration and Nationality Directorate.

WORKSTREAM	INITIAL ASSESSMENT	CURRENT POSITION	ACTION
<b>NEW LEADERSHIP - A NEW TOP TEAM FOR THE HOME OFFICE</b>			
<b>HO BOARD – intensive development programme planned to create high performing team</b>	RELEVANT Opportunity to enhance Board's strategic awareness of race equality issues	The shape and content of the Board's intensive development programme is currently being scoped.	Ensure programme of Board training considers need to encompass strategic awareness of race equality issues.
<b>DIRECTORS – personnel changes</b>	RELEVANT Opportunity to increase representation of minority ethnic staff at senior levels. Risk of representation diminishing.	We have in place targets for SCS diversity levels (Minority ethnic target for SCS- 8%by 2008) and in line with all recruitment procedures we will monitor diversity impact.	Continue positive action programmes to grow future leaders from under-represented groups. Continue to monitor & analyse diversity impacts and take follow up action when needed.
<b>DIRECTORS – skills assessment completed by end September 2006</b>	RELEVANT Opportunity to raise awareness of race equality issues & to address identified skills gaps.	All Training & development contracts consistently require our providers to promote diversity & equality of opportunity through the work they carry out for HO. This particular strand of work assesses a wide range of skills. Initial analysis suggests this workstream is unlikely to impact significantly on race equality issues. However, one element tests for valuing diversity & individuality.	Review findings from this element of the skills assessments and identify follow up action to be taken corporately.

WORKSTREAM	INITIAL ASSESSMENT	CURRENT POSITION	ACTION
<p><b>WIDER SCS – skills assessment completed by April 2007</b></p>	<p>RELEVANT Opportunity to raise awareness &amp; address skills gaps identified through assessment process</p>	<p>Initial analysis of the skills assessment work so far suggests this is unlikely to impact significantly on race equality issues. However, the assessment includes one element which tests for valuing diversity &amp; individuality.</p>	<p>Review findings from the earlier tranche of activity with Directors on this element of the skills assessments. Revise programme in light of findings if needed. Identify follow up action to be taken corporately.</p>
<p><b>TALENT MANAGEMENT – new system in place by 31/3/07</b></p>	<p>RELEVANT Opportunity to increase representation at senior levels. Risk that new systems &amp; initiatives disadvantage minority ethnic staff.</p>	<p>A full equality impact assessment will be carried out on this project when it is initiated. Research undertaken has looked at private / public sector experience in this field. Initial research has taken account views from the Network, Unions and HO's Race &amp; Diversity Action Team (RDAT). Our 5 year race &amp; diversity programme is already underway to support new leaders from under-represented groups. Support includes mentoring and positive action programmes "Development Plus" and "Leaders of the future" to ensure a diverse talent pool is identified and developed.</p>	<p>Carry out REIA on new talent management system to ensure proposals do not have potential directly/indirectly to discriminate against minority ethnic staff &amp; are in line with HO objectives on supporting leaders in under-represented groups.</p>
<p><b>NEW ORGANISATION</b></p>			

WORKSTREAM	INITIAL ASSESSMENT	CURRENT POSITION	ACTION
<p><b>CREATION OF SMALLER MORE STRATEGIC CENTRE, DEVOLVING RESPONSIBILITY FOR DELIVERY TO FRONT LINE AND NEW FRAMEWORK OF ACCOUNTABILITY BETWEEN CENTRE AND OPERATIONAL ARMS</b></p>	<p>RELEVANCE TO BE CLARIFIED Opportunity to ensure that race equality principles are built into the new framework.</p>	<p>Design work for new HO organisation underway</p>	<p>Ensure that REIA/s are carried out in planning for and setting up the new organisation.</p>
<p><b>HEADCOUNT REDUCTIONS – 30% BY 2008, FURTHER 10% REDUCTION BY 2010</b></p>	<p>RELEVANT Risk of minority ethnic representation diminishing in grades where they have higher representation especially in the lower grades</p>	<p>Equality Impact Assessment carried out in February 2005 on original restructuring programme and recommendations being implemented.</p>	<p>Review February 2005 impact assessment in light of additional planned 10% reduction in headcount. Draw up new action plan to mitigate identified risks.</p>
		<p>Monitoring data collected once staff join the Redeployment Network currently shows minority ethnic staff over-represented there but then leaving more quickly than average</p>	<p>Continue monitoring minority ethnic staff in the Redeployment Network &amp; take mitigating action on any adverse impacts. Ensure business areas continue to take race equality issues into account when restructuring, carrying out necessary impact assessments. Consult the relevant staff network and unions on proposals &amp; likely staff concerns.</p>

<b>WORKSTREAM</b>	<b>INITIAL ASSESSMENT</b>	<b>CURRENT POSITION</b>	<b>ACTION</b>
<b>SHARED SERVICES</b>	RELEVANT Risk of minority ethnic representation diminishing in grades where they have higher representation especially in the lower grades.	Ethnic diversity was a key factor considered when identifying suitability of locations for the Shared Services Centre. All the location options had a diverse ethnic population based within the catchment area.	Carry out full REIA on resourcing of the Shared Service Centre. Job Impact Assessment by Feb 2007
<b>SYSTEMATIC IDENTIFICATION &amp; MANAGEMENT OF RISK</b>			
	NOT RELEVANT	This is a re-invigoration of the existing process with a renewed emphasis on public protection risks and elevating risks from front line staff. Our assessment is that the new process and the changes to the way we manage risk should not have a disproportionate impact on minority ethnic groups.	
<b>PRIORITISATION AND RESOURCE MANAGEMENT</b>			
<b>REVIEW INTO RATIONALISATION OF HO NDPBS</b>	RELEVANCE TO BE EXPLORED	This is a new review, examining the scope for rationalisation & reporting back by April 2007.	Take forward REIA as part of the review.
<b>DEVELOPING THE PEOPLE IN THE HOME OFFICE</b>			

WORKSTREAM	INITIAL ASSESSMENT	CURRENT POSITION	ACTION
<b>DEVELOP SKILLS</b>	<p>RELEVANT            Opportunity to ensure minority ethnic staff benefit proportionately from new development initiatives. Opportunity to target under-represented groups</p>	<p>Currently places on the Management Development Programme are set aside for members of the networks as a matter of policy. The Development Plus programme targets minority ethnic groups and all grades through to Grade 6 to support and promote the development of minority ethnic staff. Also, any external development provided by tender arrangements is required to take account of diversity issues otherwise tenders will not be awarded.</p>	<p>Continue to ensure minority ethnic staff are aware of new development opportunities and then benefit proportionately. Also, we want to improve the response from employees on diversity information (e.g initiatives to raise awareness of its importance in the management of HO, &amp; moving from paper to electronic data capture at source. )</p>
<b>RECRUITMENT, SELECTION &amp; PROMOTION SYSTEMS</b>	<p>RELEVANT            Opportunity to ensure new systems are fairer &amp; address any adverse impacts for minority ethnic staff under old system .</p>	<p>The resourcing review has already met with the staff networks, RDAT and the unions at the initial stage of project work.</p>	<p>A full REIA will be carried out in the Autumn. Continue to consult minority ethnic staff and relevant staff network on proposals.</p>

<b>WORKSTREAM</b>	<b>INITIAL ASSESSMENT</b>	<b>CURRENT POSITION</b>	<b>ACTION</b>
<b>NEW REWARD FRAMEWORK – by April 2007</b>	<p><b>RELEVANT</b></p> <p>Opportunity to ensure that new framework tackles any adverse impacts for minority ethnic staff under old system</p>	<p>REIA already planned to ensure that system does not unfairly discriminate. Project aims to ensure performance assessment and links to reward systems are fair for all staff. A sample of staff will take part in trial work. The relevant staff network will be consulted &amp; members encouraged to take part in focus groups and pilots.</p>	<p>Carry out planned assessment and consultations and review plans in light of findings. Ensure relevant staff network &amp; minority ethnic staff directly are consulted on proposals. Trade unions will also be involved in this process. In addition employee representatives and management will look at the new reward framework through an established Equality Proofing Committee, which is a sub committee of the Pay Negotiation body.</p>
<b>ACCURATE INFORMATION</b>			
<b>NEW QUALITY ASSURANCE SCHEME AND RATIONALISATION OF STATISTICS</b>	<p><b>NOT RELEVANT</b></p>	<p>This work is aimed at increasing the quality of the data that we produce so, for example, it is more accurate. Our assessment is that this will have no particular impact on different ethnic groups.</p>	
<b>RELIABLE SYSTEMS AND PROCESSES</b>			

<b>WORKSTREAM</b>	<b>INITIAL ASSESSMENT</b>	<b>CURRENT POSITION</b>	<b>ACTION</b>
<b>PILOTS ON PROCESS IMPROVEMENT</b>	NOT RELEVANT	Work is concerned with increasing productivity and reducing unit cost, principally with existing workforce mix, to deliver improved services to the public. Our assessment is that the work should have no particular impact on different ethnic groups, aside from providing the benefit of improved public services.	
<b>JOIN UP INFORMATION &amp; IT SYSTEMS ACROSS THE HO</b>	RELEVANCE TO BE CLARIFIED	Possible race equality impacts will be considered as part of the project.	Build checks into the strategy development process so that race equality is considered at key stages when IST policies and standards are being considered.
<b>EFFECTIVE PROGRAMMES AND PROJECTS (PPM)</b>	RELEVANT	Section to be added to the Home Office PPM guidance outlining an approach to assessing the race equality impact of programmes and projects	Ensure issue is considered as PPM improvement workstream is developed.
<b>ENGAGING STAKEHOLDERS &amp; COMMUNITIES</b>	RELEVANT Opportunity to ensure diverse stakeholder groups are consulted, and to improve quality of engagement.	Stakeholder database and communication strategy being developed to improve relationships, streamline communications, reduce burdens on stakeholders, and deliver more coherent messages.	Analyse data to determine how diverse & representative of society our existing stakeholders are and how we currently involve them in looking at policy/products. Ensure race equality issues are built into this research, working with HO's Race Equality Adviser on building communications and engagement capability

WORKSTREAM	INITIAL ASSESSMENT	CURRENT POSITION	ACTION
<b>APPROACH AND PLAN FOR IMPLEMENTATION</b>	RELEVANT – opportunity to track benefits realisation to ensure positive impacts on diverse groups. Opportunity to mitigate identified risks.	Programme management arrangements being put in place for implementing the Reform Action Plan will integrate race equality issues into the standards and monitoring arrangements by which the programme will be managed. The following risk has been added to the risk register “Race and other diversity impacts of overall Reform Plan and individual workstreams not actively taken into account producing sub-optimal programme with potential to damage HO reputation”. Mitigating action is under development.	Ensure that business area milestone plans are cross checked for race and equality issues, and these have visibility in such plans.
<b>MORE ACTIVE STAFF ENGAGEMENT ON IMPLEMENTATION OF REFORM PLAN</b>	RELEVANT – opportunity for active & targeted involvement of minority ethnic staff as part of wider staff engagement strategy.	Permanent Secretary & Ministers have already engaged with wide range of staff over recent months, meeting and listening particularly to staff at the frontline in different parts of the business & their views have helped shape the plan.	Ensure views of minority ethnic staff help shape implementation as part of wider engagement strategy. Ensure feedback is sought on progress with implementation, through specific surveys & through the relevant staff network .