

A Manual on the Delivery of Unpaid Work

Executive Summary



The Unpaid Work Manual replaces the Enhanced Community Punishment (ECP) Manual. It establishes standards which must be met by agencies providing unpaid work for offenders sentenced to community or suspended sentence orders. The Manual should be adopted as soon as possible and no later than April 2007. Whilst retaining the underlying principles of ECP, the Manual is more concise and recognises that unpaid work may be delivered by a range of providers. It also includes additional sections such as those on risk management and Community Payback, which were not present in the ECP Manual.

Each section of the Manual includes a summary of mandatory requirements and good practice issues. This Executive Summary is a digest of the mandatory requirements and good practice, together with other key points from the Manual. It is necessary to refer to the Manual for full details of the requirements and good practice issues. A copy of the full Manual should be available to all Unpaid Work interventions staff and all offender managers.

This Executive Summary is issued together with an Equalities Impact Assessment. This Assessment and the Manual will be reviewed in April 2008 and thereafter every three years.

The Manual is divided into 14 sections. Section A gives an overview of the Unpaid Work Process.

Section B – Assessing and Managing Risk. Requirements stipulated by the Manual include:

- Use of OASys Risk of Harm Screening before offenders are allocated to work sites.
- Risk of Harm reviews in accordance with National Standards.
- Risk Management Plans (where required), which include the management of risk on Unpaid Work.
- The use of systems which enable Unpaid Work staff and offender managers to communicate.

Changes in an offender's behaviour, or circumstances, which become apparent on Unpaid Work, may indicate a change in risk, necessitating a review of the risk assessment and sentence plan. This section of the Manual also establishes standards for the placement of offenders who pose a potential risk of harm (including sex offenders) and clarifies that offenders doing Unpaid Work should not be responsible for direct personal care tasks.

Section C – Maximising Inclusion. Unpaid Work placements should be available to meet a range of individual needs, including those of disabled offenders.

Additionally:

- The views of lone females and members of minority ethnic community groups should be sought, before allocation to work placements.
- Consideration must be given to the welfare and safety of 16 and 17 year old offenders.

Maximising Inclusion also requires that offenders are allocated to the work project which is most likely to maximise inclusion and minimise risk of re-offending. It is also necessary for Unpaid Work staff to ensure that potentially oppressive and unacceptable behaviour does not take place on work sites.

Section D – Placement Quality Standards, require that all placements are assessed by skilled staff to confirm:

- They are of a good standard, meeting offender and community needs.
- Do not replace paid employment.

Unpaid Work placements should also be assessed to confirm compliance with Health and Safety legislation.

Section E – Managing Health and Safety on Unpaid Work sites. This section of the Manual additionally requires that:

- All agencies providing Unpaid Work must have a written health and safety policy, which meets the standard of the National Probation Service.
- All work sites must be assessed and approved by suitably trained and skilled staff.

Section F – Modelling Good Behaviour. This section of the Manual confirms that pro-social modelling is a key requirement of Unpaid Work. Supervisors and other staff should be trained to:

- Model positive behaviour and challenge negative or pro criminal behaviour.
- Apply rules fairly and treat people with respect.
- Develop problem solving skills by involving offenders in the planning and organisation of work.

The quality of pro-social modelling must also be monitored and assured. Section N of the Manual details these Quality Assurance requirements.

Section G – Maximising visibility and awareness of Unpaid Work. The profile of Unpaid Work was raised by the launch of Community Payback. The Manual therefore requires that:

- All suitable Unpaid Work placements should be made visible.
- Systems are in place to enable the public to suggest projects.

Information about Unpaid Work should be widely available to the public, community groups, their representatives and sentencers. Suitable projects should be publicised and Unpaid Work Managers should also keep offender managers, report writers and court officers informed about Unpaid Work activities.

Section H – Maximising Compliance and Enforcement. In addition to meeting National Standards, providers of Unpaid Work must ensure that:

- The requirements of the sentence are clearly explained to offenders.
- Good quality information leaflets are available in a range of languages appropriate to the area.

Information about Unpaid Work should be given orally at the initial assessment interview and ideally repeated at the Pre Placement Work Session. Compliance is also promoted by prompt commencement. Standing offenders down in advance, or on their work day, should also be avoided.

Section I – Vocational Skills Learning. Unpaid work provides an opportunity for offenders to gain vocation skills and skills for life. Organisations delivering Unpaid Work are therefore required to:

- Establish work placements which can support learning
- Have defined links with Learning Skills Council approved education providers.

Vocational Skills and Skills for Life should be targeted at offenders who have poor employment related skills, which are linked to their offending. For this group maximum use should be made of the 20% allowance for learning.

Section J – Offender Management. The section of the Manual applies the principles of the Offender Management Model, to ensure that offenders experience an integrated and co-ordinated service. This requires:

- Initial assessment using OASys and the Unpaid Work Assessment.
- Sentence planning in accordance with National Standards.

Unpaid work staff should be provided with sentence plans and risk information relating to offenders. This will facilitate allocation to suitable placements and ongoing risk management. Systems must also exist to enable Unpaid Work staff to contribute to sentence planning.

Sections K, L and M of the Manual establish staffing requirements for Unpaid Work. If in addition to punishing offenders, unpaid work is to be effective in reducing re-offending, it is necessary for staff to be well trained and supported. The manual sets minimum standards for organisations providing Unpaid Work in the following areas:

- Staffing structure.
- The supervision and appraisal of staff.
- Staff training.

Organisations delivering Unpaid Work must have a manager responsible for overall activities, placement managers and supervisors. Arrangements must also be in place to ensure that when working with offenders staff have access to support from a suitably qualified and experienced colleague. Supervision can be provided individually or in groups. Unpaid Work supervisors are also required to attend 4 Quality Assurance Group or practice development meetings each year. These meetings must be organised to promote the development and maintenance of pro-social modelling.

Section N – Quality assuring the delivery of Unpaid Work. This section of the Manual summarises the requirements which must be in place to assure the quality of Unpaid Work provision. In addition to confirming adequate risk management, sentence planning and compliance with National Standards, it is necessary to monitor:

- Offender management, including the proper provision and exchange of information.
- The pro-social delivery of Unpaid Work.
- The quality of placements, including compliance with health and safety requirements.
- The provision of skills learning.

Appendices to the Manual give examples of the forms required to monitor and evaluate the delivery of Unpaid Work. The completed forms must be collated and stored for monitoring purposes.

Performance Standards based on the requirements set by the Manual are to be issued. These will assist evaluation of the operation of Unpaid Work. It is planned that training materials in line with the requirements of the Manual will be available in early 2007.

Unpaid Work is a cost-effective sentence, which has the potential to build public confidence in community sentences. Its high visibility and tangible achievements make it an ideal vehicle for promoting reparation.

NPS EQUALITY IMPACT ASSESSMENT TEMPLATE

This template can be used to:

- Review an existing function, policy or practice
- Develop a new function, policy or practice.

Policy can be unwritten procedures as well as formal written policies – equality impact assessment should be carried out on any aspect of probation work which has an impact on service users and staff.

The aims of impact assessment are

- to identify potential unfair treatment or adverse impact in the way the policy or practice is implemented on any groups (in respect to race, disability, gender, faith, sexual orientation or age).
- to promote good relations in conducting Probation business
- to promote equality
- to eliminate discrimination
- to comply with the general duty in the Race Relations (Amendment) Act, and forthcoming new legal requirements covering disability (2006) and gender (2007) and other diversity strands.
- to meet legal requirements in the equality legislation and protect the Area and Service from legal action
- to improve the quality of Probation work overall and produce a real benefit for all concerned.

Ten key points to help to ensure a good impact assessment are attached. More detailed guidance is available in the Home Office template for race equality impact assessment and on the CRE web site (www.cre.gov.uk). The Disability Rights Commission will be issuing guidance on Disability impact assessment during 2006.

Most aspects of probation service work have the potential to affect people (service users, staff, partners, contractors) in different racial or ethnic groups in different ways, even though this may not be apparent at first. There may be barriers to equality which only a process of exploration and consultation will reveal. It is therefore safer to conduct a full impact assessment on most probation service policies, functions and practices.

Areas should first list all functions and policies and set priorities for impact assessment according to relevance: high, medium or low relevance.

This template has been designed mainly for use to comply with legislation on race. However it can also be used for impact assessment in relation to disability, gender, faith, sexual orientation, and age. This will be a legal requirement for disability in December 2006 and for gender in 2007 and it is good practice to start working on impact assessment in these areas now.

However there is some variation in requirements in the different legislation and it is important to note that a generic template such as this may need to be adapted as further guidance is issued, for example, from the Disability Rights Commission.

PART A: INITIAL SCREENING

PART B: PREPARING FOR IMPACT ASSESSMENT

PART C: CONDUCTING IMPACT ASSESSMENT

PART D: FOLLOW-UP TO IMPACT ASSESSMENT

A. INITIAL SCREENING

1. Title of function, policy or practice (including common practice)

Is this a new policy under development or an existing one?

Existing Policy.

A MANUAL ON THE DELIVERY OF UNPAID WORK

2. Aims, purpose and outcomes of function, policy or practice

What is the function, policy or practice addressing? What operational work or employment/HR activities are covered? What outcomes are expected?

Manual to aid the operational delivery of unpaid work across the National Probation Service in England & Wales, including partners and contractors responsible for the delivery of unpaid work.

3. Target groups

Who is the policy aimed at? Which specific groups are likely to be affected by its implementation? This could be staff, service users, partners, contractors.

For each equality target group, think about possible positive or negative impact, benefits or disadvantages, and if negative impact is this at a high medium or low level. Give reasons for your assessment. This could be existing knowledge or monitoring, national research, through talking to the groups concerned, etc. If there is possible negative impact a full impact assessment is needed. The high, medium or low impact will indicate level of priority to give the full assessment. Please use the table below to do this.

Equality target group	Positive impact – could benefit	Negative impact - could disadvantage (High, medium, low)	Reason for assessment and explanation of possible impact
Women	Yes	Potential negative impact on female staff.	The needs of female offenders are addressed within the manual. It is

			necessary to further consider the impact on female staff (particularly supervisors).
Men	Yes		The needs of male offenders are adequately addressed by the manual.
Asian/Asian British people	Yes	Not clear-needs clarification.	Full Impact Assessment needed.
Black/Black British people	Yes	Not clear-needs clarification.	Full Impact Assessment needed.
Chinese people or other groups	Yes	Not clear-needs clarification.	Full Impact Assessment needed.
People of mixed race	Yes	Not clear-needs clarification.	Full Impact Assessment needed.
White people (including Irish people)	Yes	Not clear-needs clarification.	Full Impact Assessment needed.
Travellers or Gypsies	Yes	Not clear-needs clarification.	Full Impact Assessment needed.
Disabled people	Yes	Not clear-needs clarification.	Full Impact Assessment needed.
Lesbians, gay men and bisexual people		No	
Transgender people		No	
Older people over 60		No –impairment resulting from old age is addressed under disability.	

Young people (17-25) and children		Not clear- needs clarification	Local procedures may need to be carefully considered.
Faith groups		No - in general.	Needs full impact assessment. Further exploration in this area needed.

4. Further research/questions to answer

As a result of the above, indicate what questions might need to be answered in the full impact assessment and what additional research or evidence might be needed to do this.

The manual was informally assessed before printing. A full impact assessment was undertaken subsequently. The full assessment concluded that the manual was unlikely to result in significant detriment to any group, but it did identify potential detriment to the following groups:

- Young offenders
- Offenders with mental health problems
- Female staff (particularly supervisors)

These potential concerns, together with any which arise following implementation, will be addressed when the manual is reviewed in April 2008. Further reviews of the impact assessment will take place every three years.

Initial screening done by the NPD impact assessment team (see section 4 for members):

Jill Shaw
 Head of Community Re-integration
 National Probation Directorate

Date: 26/10/06

B. PLANNING A FULL IMPACT ASSESSMENT

1. Title of function, policy or practice (including common practice)

Is this a new policy under development or an existing one?

Existing Policy.

A MANUAL ON THE DELIVERY OF UNPAID WORK

2. Aims, purpose and outcomes of function, policy or practice

What is the function, policy or practice addressing? What operational work or employment/HR activities are covered? What outcomes are expected?

Manual to aid the operational delivery of unpaid work across the National Probation Service in England & Wales, including partners and contractors responsible for the delivery of unpaid work.

3. Target groups

Who is the policy aimed at? Which specific groups are likely to be affected by its implementation? Use the initial screening to summarise potential adverse impact on each group as identified above and the reasons given. What knowledge and information do you already have, what further research or evidence should be collected in the full impact assessment?

The manual is for the use of staff with responsibility in the implementation of any aspect of the unpaid work community sentence requirement, regardless of the age, gender, race, sexual orientation, faith, or gender recognition of individuals.

Gender – The needs of offenders have been adequately addressed, but those of female staff may need further consideration.

- Race – The implementation of the manual should not have a negative impact on any group, but any possible negative impact will be given full consideration when the manual is reviewed.
- Disability – The potential impact of the manual needs clarification in respect of offenders who experience mental ill health.
- Sexual orientation/transgender – The needs of gay, lesbian and transgender offenders are adequately addressed by the manual.
- Age – Possible impairment as a result of age would be addressed in relation to disability. Local procedures for the protection and safety of young offenders may require further consideration.
- Faith – Faith needs are addressed. The manual is unlikely to have a negative impact on any faith group.

4. Impact assessment process

Which staff will conduct the IA? (e.g. Board members, senior managers, policy leads, or a team of staff.)

Jill Shaw – Head of Community Re-integration Team

Neill Martin – Unpaid Work Project Implementation Manager

David Mead – Unpaid Work Scheme Manager

John MacGregor – Business & Communications Manager, Interventions

Kathryn Ball – National HR Manager - Health & Safety

Saima Malik – Equality & Diversity Officer, Interventions – London Probation Area

Omar Ralph – Equality & Diversity Manager

Julie Taylor – Secretary to the Meeting.

Will you include external advice from community groups or individuals?

Feedback from the community beneficiaries of unpaid work will be sought.

How will the IA be approved and integrated into senior management processes?

The impact assessment will be approved by the Head of Interventions Unit, NPD.

What is the role of the diversity manager?

To contribute to the impact assessment team.

5. Consultation

Give details of any planned internal staff and external community consultation and engagement.

Members of the UW Project Board – inc Area representation
Members of the UW Reference Group – inc Area representation
Senior Probation Directorate Staff
NAPO & UNISON Leads
Staff Associations
NOMS Commissioning Team
NPD Business Development Unit
NPD Unit Heads
Health & Safety Forum Members

Who will be consulted, how will it be done, when, what are the aims of the consultation, what will be done with the results?

The manual will be reviewed by both internal and external representatives. It will be reviewed after 1 year on the basis of feedback from Probation Areas. Thereafter reviews will take place every three years.

Are a diverse range of staff, service users and stakeholders consulted?

Yes, a diverse range of internal and external staff and stakeholders have been consulted.

How will the impact assessment process be publicised to give as many people as possible an opportunity to take part?

Publicised on EPIC with a copy of the Impact Assessment.

Publicised in the Interventions Newsletter

An executive summary of the manual will be referenced on the Probation external website, together with a copy of the impact assessment.

C. CONDUCTING THE IMPACT ASSESSMENT

6. Q & A: Effect of function, policy or practice

What questions were identified in the initial screening above?

The manual could have a potential negative impact on offenders who experience mental illness, because this is imprecisely defined. The needs of sixteen and seventeen year old offenders may also need further consideration.

What other aspects of the way this policy is, or might be, implemented, should be explored?

The implementation of the manual and staff training for the delivery of the unpaid work.

Are there any points within the policy as it stands where the potential exists for negative impact on staff or service users or stakeholders across all groups?

No

Is there any existing evidence to show that adverse impact on any racial group has occurred previously in this area, if so what?

No

If not what evidence will you need to collect to assess the impact? (This might be monitoring, evidence from staff networks, evidence from service users, surveys, interviews, focus groups, wider consultation, research at national or area level on impact of similar policies or functions, etc.)

Probation Areas and other organisations responsible for the delivery of unpaid work will be required to implement the manual by April 2007. The manual will be reviewed by NOMS in April 2008. This review will be based upon information from providers of unpaid work. Unpaid work requirement completion information will also be reviewed to ensure that the manual is not having a negative impact on any equality target group.

How can you be sure you have fully understood potential for adverse impact? Have relevant community members been engaged at all stages in identifying questions to ask, areas of concern?

In addition to the above, community members will be consulted by means of beneficiary surveys. Organisations delivering unpaid work should also conduct exit questionnaires on all offenders completing unpaid work requirements. These sources will also identify if the manual is having a negative impact on any group.

What level of community consultation and engagement has taken place during the impact assessment? What were the results?

None, but future exit and beneficiary questionnaires will assist in this area.

Overall, how does the policy promote equality, eliminate discrimination and promote good relations?

The Manual for the Delivery of Unpaid Work promotes equality by addressing areas of potential discrimination.

7. Assessment of evidence and action on results

What conclusions can be drawn from the consultation and the evidence collection?

There will be no significant detrimental impact on any equality group.

Support the conclusions by reference to the outcomes of consultation and evidence collection.

The parties consulted are identified above.

Is there is a need to change amend or withdraw the policy or practice?

No. The manual will be reviewed in April 2008.

In what ways will be policy promote good relations, promote equality and eliminate discrimination? Does it need amending to reflect this?

It was concluded that the manual will promote equality and good relations. The implementation of the manual should eliminate the possibility of discrimination in the delivery of unpaid work, because consideration has been given to the potential impact on all equality groups.

If so, what action is needed, by when and who is responsible?

Future monitoring and review will address any issues which might arise following implementation.

D. FOLLOW UP TO IMPACT ASSESSMENT

8. Monitoring and management

How will the policy be monitored to measure the impact of it on the target groups?

The impact of the manual will be reviewed one year following implementation. Thereafter reviews will take place every three years.

Are monitoring arrangements adequate to measure the impact of the policy in relation to on all groups?

Race

Gender

Disability

Sexual orientation/transgender

Faith

Age

Information relating to sexual orientation/transgender is currently not available for offenders sentenced to unpaid work. It is anticipated that this will be available in the future.

What management structures are in place to ensure effective implementation of the function, policy or practice?

Data collection arrangements are in place. The implementation of the manual will be overseen by the Unpaid Work Project Board and Reference Group, both of which include representation from Probation Areas.

Unpaid work training materials will be revised and issued in January 2007. Implementation of training will be monitored.

9. Publishing the results

How will you publish the results of the IA and any subsequent monitoring to measure progress?

The impact assessment will be published on EPIC. An executive summary of the manual will be available on the Probation Website, together with the impact assessment.

In what formats, aimed at which audiences? Is the information accessible to those who need it?

The manual is for organisations and staff responsible for the delivery of unpaid work. It will be available electronically and in loose leaf format, to enable it to be revised.

How will feedback be given to those involved in consultation?

Feedback will be given to those involved in consultation, via the Unpaid Work Project Board and Reference Group. Future revisions to the manual will provide feedback to other stakeholders.

10. Approval and review

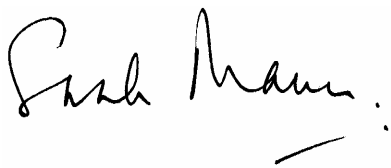
Who will give final approval of the impact assessment of the policy or function?

Sarah Mann- Head of the Interventions Unit

How often will it be reviewed in future – by when and by whom?

The manual will be reviewed after one year and thereafter every three years by the relevant NOMS team.

Final approval by:



SARAH MANN, HEAD OF INTERVENTIONS UNIT, NPD
Date of completed IA and approval 13th November 2006

RACE EQUALITY IMPACT ASSESSMENT

Ten key points to ensure a good impact assessment

The ten steps below are practical suggestions about how to approach the impact assessment process in general to ensure that it is thorough and fully evidenced.

These notes supplement the more detailed guidance in the Home Office Impact Assessment template, to which probation areas should refer for more information if required, as well as the CRE guidance on impact assessment.

1. Establish the local baseline in your area – this will help with all impact assessments

Who are your service users? Who are your staff? Who are your partner organisations and those to whom you contract services? What do you know about these groups in relation to racial and cultural background, age, faith, gender, etc? Do you have enough knowledge and information about these diverse groups to be able to assess the impact of your policies and practices on each of them? What sort of information might you need to show that you can give detailed consideration to the possible impact?

If you don't have it, how can you get it? What do you know about your local community and sources of advice and expertise that you could tap into? How can you find out? What could be available in your area or at national level, to strengthen local community sources and their capacity to help with the impact assessment process?

Are there any race equality issues in your area which should be taken into account? For example have there been any employment tribunal cases alleging racial discrimination, or complaints from service users or community groups? What well known community concerns are there beyond the probation service – for example any known concerns about policing, or poor community relations – these external factors can affect how the Probation Service delivers its services.

2. Clarify who is responsible for conducting impact assessments

Will all impact assessments be done by one person, for example, the diversity manager? Or will relevant policy and operational managers carry them up

with advice from the diversity manager? How will the assessment be communicated and actioned by senior management? How will the outcome form part of regular performance and management review processes? Are responsibility and deadlines clearly assigned and are there enough resources available for those responsible to do them properly?

Will impact assessment training be provided for all those responsible for impact assessments?

3. Set up a process for internal consultation – and use it before you start

Given the composition of your staff, who needs to be consulted internally about the impact of policy and practice? Is there already a system in place for consultation? If so how effective is it? And if not can something be put in place *before* the impact assessment process begins? Can staff associations and support groups help?

Use the internal consultation process to help identify potential problems, adverse impact or areas which the impact assessment might need to probe. This framework can be used for all policies and functions.

4. Set up a process for external consultation – and use it before you start

What is the best way for you to involve local communities, faith groups etc? What sort of support from you might they need in order to take this on effectively (resources, access, methods of communicating, frequency of consultation and so on)? Are any existing consultation methods working well and do they include the right people? If not, set up a strong and effective system of regular consultation with local communities.

Some organisations have set up an independent advisory group specifically to assist with impact assessment, by reviewing priorities for assessment, conduct of the assessment, conclusions, and bringing a challenging and fresh perspective which can be very helpful.

Once a good process is in place, consult before you begin the impact assessment to help to identify potential problems, adverse impact or areas which you need to explore.

5. **Decide what questions need to be asked about the policy, function or practice.**

Remember that policies can be unwritten – custom and practice – as well as formal written policies.

What and who does the policy or function affect? How much do you already know about the way it works: has there been any ethnic monitoring in the past, any staff or service users surveys, audit reports or other information? Are there any identified concerns?

Use this and the consultation process above to think through any potential adverse impact of each area: what are the danger points where unfair treatment might occur? How much discretion is involved, and how is this discretion supervised and by whom? How is use of discretion recorded? What management oversight and supervision is in place for the policy or function?

What are the gaps in your knowledge of the impact of this policy or practice and how can you fill them?

6. **Collect the evidence**

Evidence can be from a variety of sources: ethnic monitoring where it is in place, of staff and service users, is one source. You can also carry out surveys or interviews and focus groups specifically to gather evidence for the impact assessment, and collect further evidence from the consultation methods set up earlier in the process. There might have been inspectorate reports, or pieces of local research on a topic. Staff associations and networks may have evidence as may partners and service users.

In the impact assessment you need to describe what the various sources of evidence were; how it was obtained, from whom and what were the key issues (concerns or successes) which the evidence suggests. It is not enough to state that no adverse impact has been identified: the assessment must make clear the basis for that statement: the how, who, what and when of arriving at that assessment.

7. Act on the results

According to what the impact assessment concludes, ensure action is taken to amend the policy or function or even produce a new policy or procedure, and that responsibility and a timetable for action is clearly assigned and implementation is monitored.

8. Set up and use an effective ethnic monitoring system.

If the policy or function concerned has not been subject to ethnic monitoring in the past, and has a potential for adverse impact, you need to ensure ethnic monitoring systems are in place. All new policies and functions will also require an ethnic monitoring process to demonstrate year on year that there is no discrimination and that the policy promotes good race relations.

Make sure your local ethnic monitoring system can provide the answers to your own local questions (not just provide data for NPD statistics!) and reflects what you know about your service users and your staff. Make sure that everyone involved knows why they are monitoring and how to do it.

As well as outcomes in terms of statistics ensure you cover the use of discretion at key decision making points: how is it used, who by, who oversees the outcomes. Can you be sure discretion is always been exercised fairly and can you prove that? Provide training for the staff that will collect and analyse the ethnic monitoring information.

9. Publish the results

All race equality impact assessments should be made available to service users and staff, perhaps using the Area web site. Feedback and results should also be given to everyone, internally and externally, who was consulted. Publication promotes openness and accountability and encourages further dialogue and debate. Make sure the published results are in a range of accessible formats to meet the diverse range of access requirements.

10. Keep asking the questions!

If the ethnic monitoring and consultation is effective, the review process should become part of the routine performance and management processes so that the impact of policy and practice can be continuously reviewed.

Think about additional ways to check for impact and gather evidence as time goes by: annual service users and staff surveys, for example. Use local independent external contacts (for example local universities) to conduct small scale research projects to validate the ethnic monitoring results.

Impact assessment is an evolving and continuous process. Policy and practice changes and so do people and knowledge and understanding of race and diversity. Setting up a strong system as suggested above will mean the impact assessment process becomes mainstreamed, and can be used as a basis for impact assessment of other diversity strands such as gender, disability, sexual orientation, faith and belief, and age.