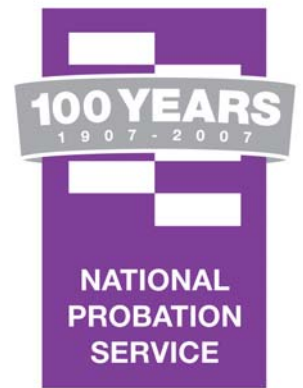


Probation Circular



PC16/2007 – QUALITY STANDARDS FOR ASSESSING THE DELIVERY OF UNPAID WORK

IMPLEMENTATION DATE: 1st September 2007

EXPIRY DATE: October 2009

TO: Chairs of Probation Boards, Chief Officers of Probation, Secretaries of Probation Boards

CC: Board Treasurers, Regional Managers

AUTHORISED BY: Sarah Mann – Head of Interventions and Substance Abuse Unit

ATTACHED: Annex A – Quality Standards for Assessing the Delivery of Unpaid Work

Annex B – Equality Impact Assessment Form

RELEVANT PREVIOUS PROBATION CIRCULARS

PC31/2004, PC57/2004, PC47/2005, PC39/2006

CONTACT FOR ENQUIRIES

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PURPOSE

To introduce the new Quality Standards for assessing the delivery of Unpaid Work and the associated self-assessment report document.

ACTION

Chief Officers should ensure that relevant staff undertake the self-assessment and return the Self-Assessment Report to the Unpaid Work Programme Manager at NOMS (preferably by email, to neill.martin33@homeoffice.gsi.gov.uk) by 28th September 2007.

SUMMARY

Unpaid Work replaced Community Punishment and Enhanced Community Punishment (ECP) with the implementation of the Criminal Justice Act 2003. In November 2006 the Manual on the Delivery of Unpaid Work was launched (see PC39/2006) for probation areas to implement by 1st April 2007.

This new self-assessment has a much lighter touch than its ECP predecessor and draws on the lessons from the report of the ECP self-assessment process (PC47/2005).

The self-assessment reports will not be used to contribute directly to the Integrated Probation Performance Framework (IPPF) although data from the audits will be shared with colleagues in NOMS so as to contribute to a more holistic understanding of area performance. It will be made clear that the information is based on self-assessment and should be viewed cautiously.

QUALITY STANDARDS FOR ASSESSING THE DELIVERY OF UNPAID WORK

Introduction

The intention is for these standards to be simple, flexible and reasonably quick to use, yet capable of providing a helpful assessment both for local probation areas (or other providers of Unpaid Work) and NOMS.

The flexibility comes largely from the discretion available to those completing the assessment over the amount of detail and the nature of the evidence gathered. Inevitably, the more that goes into the assessment, the more comprehensive will be the outcome and the more useful will be any development plan that flows from it. However, it will be for areas to balance the benefits of thoroughness against the staff time required to complete it.

The aim is to encourage Unpaid Work providers to look beyond performance targets (this is not to minimise their importance) to a range of indicators that build up a picture of the quality of the service provided. As well as providing a framework for reporting the self-assessment to NOMS, this process can also be used as part of the preparations for contestability by gathering evidence and rehearsing arguments about quality. There is not, however, a direct link in this process with unit costs and the Value For Money debate. Nonetheless, those links will not be hard for area services or other providers to make.

Structure of the standards

The standards themselves are arranged in three principal sections:

- Standards relating to **Delivery Outcomes** – focusing on issues that impact on reducing re-offending and promoting successful completion (e.g. offenders helped into employment or training, management of risk, offenders undertaking six hours work per week);
- Standards relating to **Delivery Mechanisms** – focusing on working practices that maximise successful outcomes (e.g. PPWS arrangements, allocation practices, contribution of UW staff to sentence planning and review);
- Standards relating to **Supporting Structures** – focusing on those aspects of the organisation that directly support the delivery mechanisms (e.g. staff selection and training, Diversity and H&S policies, resourcing, partnership/alliance arrangements).

Each section has a small number of standards expressed as positive statements. Each standard is cross-referenced to the relevant National Standards and Offender Management (OM) Standards, where applicable, and is supported by a list of indicators. These lists are not exhaustive and those completing the self assessment are free to call on other areas of information to build up the most comprehensive picture of quality that they can. This may relate to local circumstances or to indicators that could apply to any area but were not included in the list.

Finally, there is a simple section in which areas, or the provider completing the assessment, rate themselves against each standard and provide an overall rating. This is the section that forms the return to NOMS.

Use of the standards

Although the first submission to NOMS is to be in September 2007, areas may well choose to go through the self-assessment process much earlier than that as part of their preparations for contestability. The composition of an assessment team is a matter for local discretion but a combination of knowledgeable staff and 'fresh eyes' is likely to prove beneficial.

Experienced staff within Unpaid Work and Information Sections are likely to know the information needed to provide evidence for the indicators and where to find it; it is predominately information used for routine monitoring. There is no requirement to gather it all together physically, nor is there any external validation exercise as has been the case with some previous assessments.

There is an opportunity to provide an evidential narrative with the ratings but whether to do so, and the extent of it, is a matter for local discretion. Clearly where the rating provided by an area appears to be at odds with the performance data it would be helpful to have the supporting evidence for the rating identified, especially where it falls outside the list of indicators.

Once the assessment has been completed, the area, or other provider undertaking the assessment, may choose to write a local development plan to ensure that improvement is made and sustained before the next self-assessment. There is no requirement to submit a development plan to NOMS along with the assessment (although clearly it would be of interest) but it could be useful information to provide to the Regional Offender Manager to demonstrate that assessment and improvement are taken seriously when the time for contestability comes.

The ratings

Those undertaking the self-assessment are asked to rate the extent to which they meet each standard, and an overall rating, in four bands:

- Excellent

- Good
- Inconsistent
- Poor.

Because the nature of the indicators is broad it is not possible to make these rigid numerical bandings. However, many of the indicators themselves are numerical in nature which does help to set the starting point for the more subjective assessment of the banding.

The criteria to be used for these bands are:

Excellent

- Consistently high levels of performance in indicator areas (meeting or exceeding targets where set);
- Strong systems and sound practice in place to support and improve quality and performance;
- Significant innovation to improve quality and performance.

Good

- Good levels of performance in most indicator areas (meeting or exceeding most targets where set);
- Good systems and practice in place to support quality and performance;
- Innovation to improve quality and performance.

Inconsistent

- Good levels of performance in only some of the indicator areas (not meeting some significant targets);
- Some evidence of systems and practice to support quality and performance;
- Some innovation to improve quality and performance.

Poor

- Generally poor levels of performance in indicator areas (targets, where set, substantially not met – both number and extent);
- Limited or no systems or practice to support quality and performance;
- Limited or no innovation to improve quality and performance.

UNPAID WORK QUALITY STANDARDS

SECTION ONE

DELIVERY OUTCOMES

1. Offenders are helped into learning and employment

National Standards:	SS5.6; SS6.8; SS6.10
OM Standards:	2b.6; 2c.17

Indicators

- Numbers gaining and keeping employment (may be helpful to express this as a proportion of those UW offenders unemployed at commencement of order)
- Numbers engaged in training/education
- Numbers gaining qualifications
- Proportion where 20% allowance of Unpaid Work hours used
- Level of employer engagement.
- Level of engagement with education/training providers.

2. Offenders complete their Unpaid Work requirements in a timely fashion

National Standards:	SS4.2; SS6.6; SS6.7; SS6.10; SS6.11; GS8; GS9; SS10.5
OM Standards:	2c.10; 2c.17; 2d.4; 2e.3; 2e.5; 2e.6; 3.2

Indicators

- Percentage offered 6 hours work per week
- Percentage attending for 6 hours work per week
- Percentage where first work is arranged within 10 days
- Percentage where first work takes place within 10 days
- Conversion rate (the number of successful completions expressed as a proportion of **all** terminations)
- Enforcement activity
- Days lost through stand downs etc.
- Practices to encourage compliance.

3. Risk of Harm is managed appropriately

National Standards:	SS2.6; SS5.1
OM Standards:	2a.6; 2b.4; 2b.8; 2c.17; 2c.19; 2d.1

Indicators

- Unpaid Work staff ensure that offenders are only allocated to work sites once a RoH screening has been completed and received
- Medium and High Risk of Harm offenders are all placed in groups supervised by suitably trained and knowledgeable staff (appropriate targeting is a quality indicator of the Offender Management, this indicator relates to the way that those medium/high risk of harm cases sentenced to Unpaid Work are managed on UW)
- Supervisors and other UW staff are informed of risk issues by Offender Managers
- Supervisors and other UW staff communicate routinely with Offender Managers about risk issues
- Allocations are reviewed in response to changing risk information
- All sex offenders are allocated to supervised groups of an appropriate size to properly manage the level of assessed risk
- Offenders allocated to work sites where children or vulnerable adults may be present have been fully assessed, including relevant ECRB checks where appropriate.

4. Unpaid Work is positive, visible, inspires confidence and community engagement, and promotes change

National Standards:	SS1.4(10)
OM Standards:	2c.17; 3.6

Indicators

- Levels of beneficiary and other stakeholder satisfaction
- Offenders' responses to exit questionnaires
- Extent to which offenders understand and appreciate the purpose of the placement
- Level and nature of pro-active offender engagement (see PC 10/2006)
- Level of public/community involvement in nominating work
- Level of contribution to the local community safety strategy, including restorative justice and taking account of victims
- Percentage and nature of UW projects targeted specifically at BME and faith communities
- Change identified by OASys
- Levels of completion without re-offending
- Levels of Community Payback badging and other means to heighten visibility

- Assessment of Pro-Social Modelling practice by supervisors etc.
- Evidence of direct relationship between offenders and beneficiaries/placement providers.

UNPAID WORK QUALITY STANDARDS

SECTION TWO

DELIVERY MECHANISMS

1. Offenders are appropriately prepared for Unpaid Work

National Standards:	SS4.4; SS4.5; SS4.6
OM Standards:	2c.6; 2c.7; 2c.9; 2c.17; 3.1

Indicators

- Proportion of cases with PSAI completed within 5 days
- Proportion of offenders going through PPWS prior to first work session
- QA and other evaluation of PPWS
- Programme/content of PPWS covers areas identified in the manual on the delivery of Unpaid Work
- Proportion of Individual Placements with local induction procedures and evidence of delivery
- Supervisor PSM checklist scores re: explaining/planning work
- Offender responses to exit questionnaires.

2. Offenders are appropriately matched and allocated to placements

National Standards:	SS2.6;
OM Standards:	

Indicators

- Differential systems for allocating under 41 OGRS and over 41 OGRS cases
- Levels of completion of Offender Needs and Placement Quality matrix
- Proportion of medium/high risk cases allocated to supervised groups
- Proportion of cases with matrix and allocation completed before PPWS
- Proportion of allocations with accurate match

3. Unpaid Work staff contribute effectively to the planning and review of sentences containing Unpaid Work requirements

National Standards:	SS5.7
OM Standards:	2b.3; 2b.4; 2b.5; 2c.2; 2c.4; 2c.5; 2d.1; 2d.2; 4.4; 4.7

Indicators

- Proportion of cases with sentence plan/review objectives relating to Unpaid Work
- Proportion of medium/high risk of harm cases in which the risk management plan identifies risk issues relating to Unpaid Work (appropriate targeting is a quality indicator of the Offender Management, this indicator relates to the way that those medium/high risk of harm cases sentenced to Unpaid Work are managed on UW)
- Level of formal consultation between Offender Management and Unpaid Work staff
- Level of informal consultation between Offender Management and Unpaid Work staff
- Proportion of case files/records with evidence of consultation (contact logs/sentence plans/reviews etc.)
- Evidence of link objectives between learning on UW and other Interventions in Sentence Plans.

4. The diverse needs of offenders are identified and catered for appropriately

National Standards:	SS6.8
OM Standards:	2c.17

Indicators

- Evidence that the views of those who would be lone women or ethnic minority offenders in a group are sought and taken into account when deciding on allocation to a work site; proportion where views were sought/not sought
- Evidence that arrangements are in place to ensure that in respect of 16 and 17 year old offenders, Unpaid Work is delivered in accordance with the Children Act 2004 section 11
- Evidence that Unpaid Work is arranged to allow offenders to engage in normal employment, education or training routines
- Evidence that arrangements are in place to help offenders with caring responsibilities to complete their Unpaid Work requirement

- Evidence of positive action to eliminate discrimination in accordance with the gender equality duty imposed by the Equality Act 2006
- Evidence that placements are available to meet the needs of disabled offenders; proportion of disabled offenders placed/not placed
- Local guidance in place to help UW staff work positively with offenders displaying difficult behaviour (e.g. through Asperger's Syndrome) or specialist advice sought where needed
- The level of use of interpreters and written information in foreign languages

5. All placements are assessed, reviewed, and remedial action taken where necessary, in accordance with Placement Quality Standards and Health and Safety requirements

National Standards:	SS6.12
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OM Standards:	
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Indicators

- Proportion of placements with Placement Quality Checklist completed and up to date (initial, post remedial action, review)
- QA monitoring of PQS checklists
- Evidence of Health and Safety and Risk Assessments completed and reviewed
- Evidence that appropriate insurance cover is in place
- Evidence that Unpaid Work projects do not deprive anyone of paid employment
- Evidence of Supervisors' daily Health and Safety checks
- Proportion of Incident/Accident Reports acted upon

UNPAID WORK QUALITY STANDARDS

SECTION THREE

SUPPORTING STRUCTURES

1. Unpaid Work staff are appropriately selected and trained

National Standards:

OM Standards:

Indicators

- Proportion of staff undertaking recognised Unpaid Work training
- Range of places posts are advertised to ensure access by all sections of the community
- Links between selection process, including interview questions, and competencies for each post
- Quality Assurance reports demonstrating the effectiveness of training

2. The organisation's policies effectively support practice

National Standards:

OM Standards:

Indicators

- Number and range of relevant extant policies (e.g. Diversity, Supervision and Appraisal, Health & Safety, managing absence, managing poor performance)
- Outcomes of policy monitoring exercises
- Evidence that policies are launched to all Unpaid Work staff and championed by senior managers

3. Unpaid Work is appropriately resourced

National Standards:

OM Standards:

Indicators

- The proportion of the budget devoted to Unpaid Work

- Numbers of staff in Unpaid Work roles
- Arrangements with partners/beneficiaries for the provision of materials and equipment
- Number of days lost through stand downs
- Average number of days between PPWS and next work session

4. Partnership arrangements expand provision, add value, support and improve quality and performance

National Standards:	SS1.4(7)
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OM Standards:	
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Indicators

- Examples of additional provision through partners
- Number of partnership arrangements
- Range of partnership arrangements (especially with reference to the Alliances) and proportion of work provided through those arrangements
- Proportion of work undertaken in partnership with Local Strategic Partnerships and CDRPs
- Quality Assurance reports linking partnership arrangements with quality and performance
- Percentage and nature of UW projects targeted specifically at BME and faith communities.

5. Quality Assurance procedures are used to maintain standards and improve quality and performance

National Standards:	SS1.4(1)
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OM Standards:	4.9
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Indicators

- QA roles and responsibilities are ascribed to particular post(s) and identified in job descriptions
- Numbers of PSM checklists completed
- Numbers of Quality Assurance groups and levels of attendance
- Systems and schedule for collating and assessing QA information
- Routine feedback from QA Manager to practitioners and managers
- QA information used routinely in planning/improvement measures of Unpaid Work Unit
- Evidence of changes/improvements made on the basis of QA information

QUALITY STANDARDS FOR ASSESSING THE DELIVERY OF UNPAID WORK

SELF ASSESSMENT REPORT

Organisation completing the assessment:		EXCELLENT	GOOD	INCONSISTENT	POOR
Date:					
SECTION ONE – DELIVERY OUTCOMES					
1	Offenders are helped into learning and employment				
	Evidence				
2	Offenders complete their Unpaid Work requirements in a timely fashion				
	Evidence				
3	Risk of Harm is managed appropriately				
	Evidence				
4	Unpaid Work is positive, visible, inspires confidence and community engagement, and promotes change				
	Evidence				
SECTION TWO – DELIVERY MECHANISMS					
1	Offenders are appropriately prepared for Unpaid Work				
	Evidence				
2	Offenders are appropriately matched and allocated to work placements				
	Evidence				
3	Unpaid Work staff contribute effectively to the planning and review of sentences containing Unpaid Work requirements				
	Evidence				
4	The diverse needs of offenders are identified and catered for appropriately				
	Evidence				
5	All placements are assessed, reviewed, and remedial action taken where necessary, in accordance with Placement Quality Standards and Health and Safety requirements				
	Evidence				
SECTION THREE – SUPPORTING STRUCTURES					
1	Unpaid Work staff are appropriately selected and trained				
	Evidence				

2	The organisation's policies effectively support practice				
	Evidence				
3	Unpaid Work is appropriately resourced				
	Evidence				
4	Partnership arrangements expand provision, add value, support and improve quality and performance				
	Evidence				
5	Quality Assurance procedures are used to maintain standards and improve quality and performance				
	Evidence				
	Overall rating				
	Comments				

A. INITIAL SCREENING

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

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

New Probation Circular and self-assessment framework

PC16/2007 – Quality Standards for Assessing 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?

Standards and a self-assessment framework for probation areas or other providers of Unpaid Work to assess the quality of performance of their Unpaid Work delivery, and to report this to NOMS.

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.

NPS staff or staff in other organisations responsible for the delivery of Unpaid Work.

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	Reason for assessment and explanation of possible impact
Women	Medium	No	Self-assessment may lead to identification of gaps in provision leading to

NPS Race Equality Impact Assessment template

			improvements.
Men	Medium	No	As above
Asian/Asian British people	Medium	No	As above
Black/Black British people	Medium	No	As above
Chinese people or other groups	Medium	No	As above
People of mixed race	Medium	No	As above
White people (including Irish people)	Medium	No	As above
Travellers or Gypsies	Medium	No	As above
Disabled people	Medium	No	As above
Lesbians, gay men and bisexual people	Medium	No	As above
Transgender people	Medium	No	As above
Older people over 60	Medium	No	As above
Young people (17-25) and children	Medium	No	As above
Faith groups	Medium	No	As above

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.

No questions identified.

Initial screening done by:

Name/position

Date

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?

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?

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?

- Gender
- Race
- Disability
- Sexual orientation/transgender
- Age
- Faith

4. Impact assessment process

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

Will you include external advice from community groups or individuals? (cross reference to question 5 below)

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

What is the role of the diversity manager?

5. Consultation

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

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

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

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

C. CONDUCTING THE IMPACT ASSESSMENT

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

(use the questions as prompts, not as a list which must be answered in every case)

What questions were identified in the initial screening above?

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

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?

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

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.)

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?

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

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

7. Assessment of evidence and action on results

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

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

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

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

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

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?

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

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

9. Publishing the results

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

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

How will feedback be given to those involved in consultation?

10. Approval and review

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

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

Final approval by _____ (name)

Date of completed IA and approval _____

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 out

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.