



Civil Nuclear Police Authority/ Civil Nuclear Constabulary

Equality & Diversity Strategy (2007-2010)

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1 Introduction to the CNPA and the CNC

The Civil Nuclear Police Authority (CNPA) was created on the 1st of April 2005 under The Energy Act 2004. The CNPA is a corporate body and is an executive Non-Departmental Public Body (NDPB), operating under the strategic direction of the Department for Business, Enterprise and Regulatory Reform. The CPNA is the employer of the Civil Nuclear Constabulary (CNC) which was also established on 1 April 2005 as directed by The Energy Act 2004 to provide specialised armed police protection of civil nuclear sites and nuclear materials.

2 Aims of the Equality & Diversity Strategy

Through this strategy we aim to fulfil our commitment to promoting equality and diversity as both an employer and a service provider and eliminating discrimination in all its forms on grounds of race, gender, age, disability, sexual orientation and religious belief. Through this strategy we aim to provide an overall steer as to how we will make progress in this important area and mainstream equality and diversity in all that we do. In a way which supports the delivery of our strategic aims and delivers our commitment to the nuclear industry and local communities.

This strategy recognises that race relations are of particular significance to policing, highlighted by Stephen Lawrence Enquiry and the subsequent McPherson Report (1999) which outlined the view that 'institutional racism' existed amongst public organisations and specifically within the Police. This strategy also recognises our broader remit of additional public duties with regards to promoting race, gender and disability equality as required by the Race Relations Amendment Act (2000), Equality Act 2006 and Disability Discrimination Amendment Act (2005) respectively.

In implementing this strategy we aim to achieve the following aims:

- Positioning the CNPA/CNC as an employer of choice who recognises encourages and values diversity for the benefit of the organisation and society as a whole;
- Eliminating unlawful discrimination in all its forms (including harassment) for all stakeholders
- Ensuring a workplace culture and working environment which is underpinned by principles of equality, respect, fairness and flexibility;
- Secure organisational and individual accountabilities to make our equality and diversity vision a reality;
- Promoting individual responsibility and accountability for implementing CPNA values in terms of workplace behaviours;
- Recruitment, development and retention of staff from minority groups to help us reflect the communities we serve;
- Tackling perceptions of discriminatory attitudes and behaviours within policing

- Fulfilling our commitment to consult with and involve representative stakeholders to help set our equality and diversity priorities;
- Increasing public confidence in our service amongst minority groups;
- Develop, publish and implement an Equality & Diversity Scheme to address our public duty to promote race, gender and disability equality.
- increased knowledge and awareness of the diverse needs of the site and local communities to ensure all interactions between ourselves and site employees / contractors / visitors and general public are appropriate and understood
- a workforce that is representative of the communities we police
- all employees will be aware of and understand their role in embracing diversity and delivering its aims through access to a portfolio of relevant diversity training material

3 The case for valuing equality and diversity

This strategy reflects our appreciation and recognition of the various driving factors behind valuing equality and diversity:

3.1 The moral argument

We believe that ensuring that stakeholders have access to employment and career development opportunities and good policing outcomes is clearly the right direction morally and support our values of corporate social responsibility. This position reflects the trust invested in us by stakeholders as a police force which is both an employer and a public service provider.

3.2 Complying with the law

The impact of Human Rights and anti-discrimination legislation over recent years has been considerable and place a greater emphasis upon public bodies to produce evidence that they are taking a much more proactive approach to fairness and equality. We will demonstrate continual learning in our efforts to meet our legal obligations and in the monitoring of our effectiveness as an organisation.

We readily accept the legislative and statutory requirements that fall on us as an employer and a service provider to eliminate discrimination on grounds of race, gender, age, disability, sexual orientation and religious belief. We also embrace our additional public duties with regards to promoting race, gender and disability equality as required by the Race Relations Amendment Act (2000), the Equality Act 2006 and the Disability Discrimination Amendment Act (2005) respectively (as reflected in our Equality and Diversity Scheme).

3.3 The Business Case and how diversity can influence performance

In addition to the clear legal and moral drivers the impetus for change we also appreciate that valuing equality and diversity can help us meet our strategic objectives and ultimately makes good business sense. We believe that valuing equality and diversity and meeting the aims of this strategy will enhance the performance of frontline policing and meet the expectations of the public and inspire their confidence in terms of fair treatment and will position us as an employer of choice.

To this end, we anticipate that promoting equality and diversity will achieve the following business benefits:

- Attraction of top talent through equitable and inclusive recruitment processes creating a work force which represents the communities we serve (*In just seven years, only a third of the workforce will be male and under 45.1*) (*Office of National Statistics British Labour Market Projections 1998*)
- Rewarding, developing and valuing staff will improve satisfaction levels and retention. This will prevent the loss of valuable knowledge and expertise and will also help to reduce recruitment costs (The Hay Group says employee turnover could cost companies up to 40% of their annual profits (The Retention Dilemma. Hay Group 2001)
- Staff retention (including returners after maternity leave) through development and implementation of family friendly policies and work-life balance initiatives (In an Opportunity Now survey over a fifth of senior women in UK organisations said they would change jobs for more flexible working arrangements Breaking the Barriers: Women in Senior Management in the UK, Opportunity Now 2000)
- Productivity - climate of respect and inclusion increases productivity as staff can simply get on with their job and not be distracted by grievances
- Opportunity to partner with national and local specialist agencies and charities to promote a positive brand image of the CNC amongst potential staff (to attract the best) and members of the public to inspire confidence in our service delivery and Policing outcomes
- Reduced absenteeism due to grievances of alleged discrimination and harassment. (The Health and Safety Executive (HSE) estimates that bullying accounts for up to 50% of stress-related workplace illnesses, which means that every year, bullying costs UK employers 80 million lost working days and up to £2billion in lost revenue (ECU Dignity at Work Project 2007).
- Message of valuing diverse perspectives leads to innovation and can tap into the potential of individuals for overall success (A survey of financial analysts by Ernst and Young showed that innovation was rated one of the top ten (non-financial) variables crucial to the success of the business (Lowe and Siesfield, Measures that matter, Ernst and Young, 1998))
- Proactive elimination of risk to include a) reputation risk of high profile cases of discrimination/harassment b) significant financial risk of litigation
- Rewarding, developing and valuing staff will improve satisfaction levels and retention. This will prevent the business from losing valuable knowledge and expertise and will also help to reduce often significant recruitment costs

4 Strategic Framework

This strategy supports the following key aims articulated within The CNPA/CNC Policing Strategy:

- “Ensure the Constabulary is managed in a way that gets the best out of all its resources, especially staff, and demonstrates value for money, whilst maintaining the confidence of the public”
- “Maintaining and improving understanding between the Constabulary, its nuclear customers, the public, other stakeholders and Government, including politicians, throughout the UK”

This strategy enables us to make progress in the diversity representational targets detailed in the Annual Policing Plan which supports the Policing Strategy and also supports the CNPA/CNC People Management Strategy designed to maximise the potential of all staff whilst promoting a fair and equal workplace with recognition and encouragement of diversity, Community Engagement Strategy and Staff Training Strategy.

In addition, through the implementation of our Equality and Diversity Strategy we aim to respond positively to the following external strategic drivers which include the following:

- The Government’s Vision for the Civil Nuclear Industry
- The strategic direction of The Nuclear Decommissioning Authority (NDA)
- Requirements of the industry regulator (The Director for Civil Nuclear Security).
- Impact of the Government’s white paper ‘Building Communities, Beating Crime’ (Nov 2004) concerning workforce modernisation, neighbourhood policing and greater involvement of the community
- The Association of Chief Police Officers (ACPO) Race and Diversity Strategy (2003) which evidences a commitment to “Improve policing services in order to promote community cohesion, tackle vulnerability and challenge racism and all other forms of discrimination”
- The Association of Police Authorities (APA) Strategy for Improving Performance in Race and Diversity 2004–2009 which confirms that everyone in the police service must be held accountable for their performance in race and diversity issues with the belief that “valuing diversity is crucially important to the development of policing in the 21st century”.

5 Leadership, accountability and responsibility

Role of the Civil Nuclear Police Authority:

- Ensure that in recognising our scheme's vision that the authority is meeting its legal duties as an employer and service provider to promote equality and diversity and eliminate unlawful discrimination.

Role of the Chief Constable:

The Chief Constable champions equality and diversity within our organisation and is specifically responsible for:

- Giving a consistent and high profile lead on equality and diversity issues;
- Promoting our Equality and Diversity Strategy (and supporting equality and diversity scheme and action plan 2007-2010) internally and externally;
- Leading by example in terms of workplace behaviours.

Role of CNC senior management:

The senior management team is responsible for:

- Maintaining a strategic commitment to equality and diversity and monitoring our progress;
- Taking action against behaviour which does not support equality and diversity;
- Leading by example in terms of workplace behaviours.

Role of managers:

All staff with management responsibilities are responsible for:

- Ensuring staff receive training in equality and diversity;
- Taking action against behaviour which does not support equality and diversity;
- Leading by example in terms of workplace behaviours.

Role of the HR Officer (Workforce Diversity):

The role of the HR Officer (Workforce Diversity) is an advisory role which provides the organisation with the knowledge and skills to enable the Constabulary to fully meet our equality and diversity obligations.

Responsibilities of all members of our organisation:

All staff, suppliers, providers, contractors and users of facilities must adhere to the principles of our strategy at all times, specifically:

- Treating colleagues and members of the public with respect at all times;
- Not using language which could cause offence;
- Having due regard to consider how you can promote equality and diversity considerations in your work;
- Keeping up to date with equality and diversity issues and taking up training opportunities as appropriate;

- Reporting behaviour which does not support equality and diversity to your manager or to Human Resources.

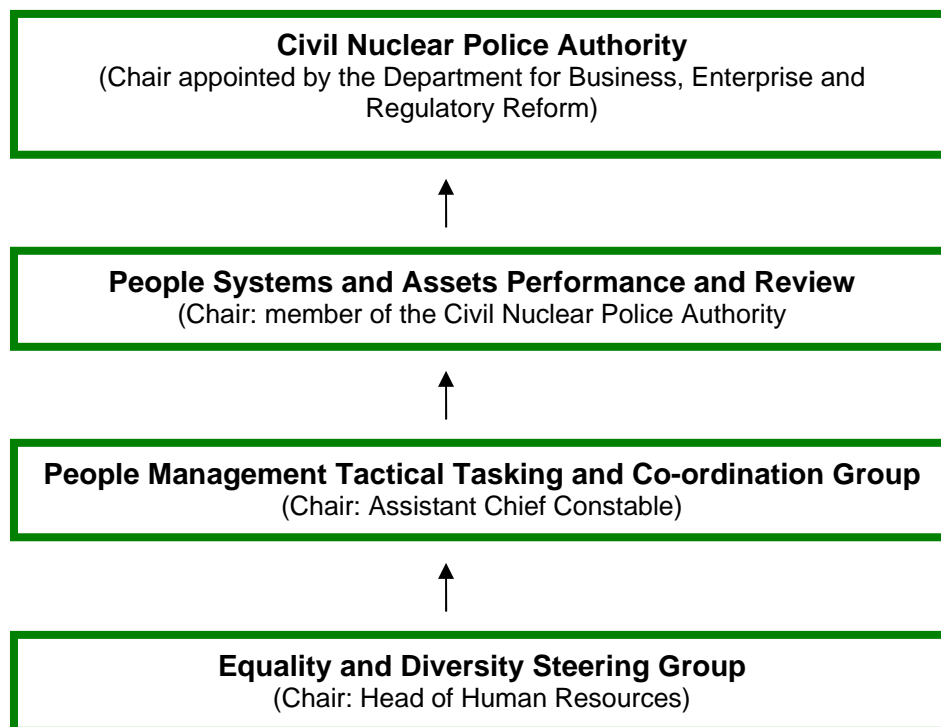
The contribution of all staff in promoting equality and diversity will be measured through our Performance Development Review (PDR) processes.

6 Implementation and monitoring arrangements

The implementation of this strategy is underpinned by the ongoing key activities:

- Partnership working and community engagement
- Staff training
- Policy development and review
- Equality and diversity monitoring activities for staff recruitment and career development
- Personal leadership
- Accurate performance appraisal
- Encouragement of independent support staff networks
- Development, publication and implementation of the CNPA/CNC Equality and Diversity scheme and Action Plan specifically addressing race, gender and disability equality
- Staff consultation activities

The above will be monitored by our internal and external monitoring structures to ensure continued progress as follows:



- **Civil Nuclear Police Authority:**

The Police Authority sets the strategic direction of the Constabulary and is ultimately responsible for the success of this strategy. This group is responsible for maintaining and refining our strategic approach to equality and diversity through development of our Annual Policing Plans and Policing Strategy. The Police Authority will monitor progress as reported by the People Systems and Assets Performance and Review Committee.

- **People Systems and Assets Performance and Review Committee:**

This group is responsible for monitoring progress (as reported by the People Management Tactical Tasking and Co-ordination Group) to ensure progress meets our strategic priorities linking in to the Annual Policing Plan. This committee will monitor progress of the diversity strategy (to include the Equality and Diversity Scheme) through its translation into action and assessment of these indicators will be made through a range of established quantitative HR measures (to include workforce representation targets) as well as those more qualitative indicators of cultural development and attitudinal change.

- **People Management Tactical Tasking and Co-ordination Group:**

This group is responsible for monitoring progress as reported by the Equality and Diversity Steering Group and tasking and coordinating activities accordingly. This committee will report progress to the People Systems and Assets Performance Review Committee linking in to our performance indicators within our Diversity Strategy (which link to our Annual Policing Plan targets). This group is also responsible for the formal review of the scheme every three years making use of the evidence gathered to date and the results of impact assessments carried out.

- **Equality and Diversity Steering Group:**

Chaired by the Head of Human Resources, this group comprises of key individuals responsible for the implementation of our scheme across the various functions, trade union representatives and representatives of employee network groups. The committee is a vehicle to share progress and discuss relevant issues effecting our scheme's content and implementation. Consultation activities will be co-ordinated by members of this group in partnership with the HR Officer (Workforce Diversity).

In terms of external monitoring arrangements, Her Majesty's Inspectorate of Constabulary (HMIC) has formal responsibility for the inspection of Police Forces to ensure overall 'efficiency and effectiveness'. The annual HMIC Baseline Assessment measures a full range of police functions and activities, which specifically include race and diversity. The results of these monitoring exercises will continue to help steer our strategic direction for ongoing improvement in equality and diversity. Police performance nationally is assessed through the Policing Performance Assessment

Framework¹ which measures performance against key areas including equality and diversity. Statutory Performance Indicators (SPIs) for the Police are aligned to these areas and measure outcomes of operational policing. These SPIs and the measurements against them are set annually and, where appropriate to our policing function, are reported in our Annual Policing Plan.

We have set up monitoring arrangements and performance indicators to measure the effectiveness of our Equality and Diversity Strategy which links to our strategic objectives and targets within our Annual Policing Plan. A range of performance indicators both quantitative and qualitative have been formulated and agreed by The HR Manager, as well as some aspirational targets. These include reference to Statutory Performance Indicators and can be found as Appendix 1.

7 Risk management and resource implications

Focus must be maintained on implementation to ensure progress made to date within the equality and diversity agenda is consolidated and built upon to achieve its ultimate aims. The organisation may be at risk of the following without this co-ordinated holistic approach:

- Slow reaction or inappropriate response to legislative changes could lead to costly claims of discrimination, affecting employee relations and ultimately retention and our reputation
- Challenges from relevant commissioning bodies with the risk of legal action regarding non-compliance with statutory duties
- Without effective consultation with under-represented communities and any appropriate positive action, our attractiveness as an employer will not be influenced and aspirational employment targets will not be achieved
- Effectiveness of diversity awareness training in retaining public and stakeholder confidence will only be realised if time / resources are made available to contextualise further current training provision and develop a portfolio of additional localised learning solutions

To manage the above risks a number of resources must be considered:

- Resource capacity - The role of HR Officer (Workforce Diversity) is now established. The procurement of further expertise will be made at minimum cost e.g. equality networking groups, seminars and relationship building within other policing environments.
- Consultation – Accessibility to representatives from minority groups and representative organisations will be supported through corporate / individual membership of relevant staff support groups such as Gay Police Association, British Association for Women in Policing and National Black Police Association.
- Internal expertise – Equality and Diversity management is an underpinning activity of the People Management Strategy and therefore relies on the support and expertise of HR Officers and line managers in relation to policy

¹ To be replaced by the Assessment for Policing and Community Safety (APACS) in 2008

development. Support with interpretation of performance data and benchmarking against industry standards and thematic inspection is also required.

- Training- The provision of a wider training portfolio and forecast for absences from duty will be planned for through formal recommendations within the annual costed training plan.
- Corporate memberships – formalising links with relevant organisations or gaining access to their full range of services such as legal advice or industrial benchmarking may mean additional cost in subscription fees. The validity of such expenditure will be carefully considered and validated through The HR Manager and relevant budgetary processes.
- Management information - For effective monitoring existing electronic records must remain credible and up to date. Ease of analysis could be improved to avoid duplication through maximising the capability of the existing HR Information Systems, which is being considered as part of our IT Strategy.

8 Arrangements for reviewing the strategy

This strategy will be reviewed by the HR Officer (Workforce Diversity) on an annual basis in consultation with the following groups:

- People Management Tactical Tasking and Co-ordination Group (PMTTCG)
- PMTTCG Equality & Diversity Steering Group
- Trade Unions
- Staff Diversity Network Groups
- External stakeholder as appropriate

9 Appendix 1: Performance Indicators

Measurements in bold taken from CNPA Annual Policing Plan 07/08, with additional targets set to identify pace of cultural change and success of diversity initiatives.

Aim & Approach	Continuing or new	Measurement / Target
<p>Increased knowledge & awareness of the diverse needs of the site / communities will ensure interactions between ourselves and site employees, contractors, visitors & general public are appropriate & understood</p>	<p>Continuing</p>	<p>CNC Attendance of at least 2 NDA local stakeholder meetings</p> <p>Review stakeholder input at Operational Unit management review meetings</p> <p>Zero complaints relating to bullying / harassment / discrimination</p> <p><i>“Stop and Account”</i> searches by ethnicity – no statistically adverse impact</p>
<p>Our workforce will be representative of the communities we police</p>	<p>New</p>	<p>Increase % of minority ethnic group personnel from 0.5% to 4% of new recruits during 2007-2010.</p> <p>Increase proportion of police recruits from minority ethnic groups compared to proportion of people from minority ethnic groups in economically active population.</p> <p>Increase % of female recruits from 9% to 15% of new recruits during 2007-2010.</p> <p>Improve resignation ratio of minority ethnic group personnel from 1.6 to 1 to 1.5 to 1 or better</p> <p>Establish accurate data of % of police officers & staff declaring they meet the DDA disability definition as % of total workforce</p> <p>Completion of all actions within Age Discrimination Legislation action plan</p>
<p>Update and Implement the diversity strategy developed in 2005/6 including implementing Public Authority Duties under the <u>2006 Equality Act</u>.</p> <p>reaching all parts of the organisation in practical terms</p>	<p>New</p>	<p>Produce Race Equality Scheme by July 2007.</p> <p>Compliance with the requirements of the Equality Act within three months of publication.</p> <p>Implement arrangements to comply with the Gender Equality Duty in April 2007.</p> <p>Monitoring as part of the overall equality scheme will be an indicator of adverse impact on any policy / practice</p> <p>Zero % of claims of discrimination from employees</p>

<p>All employees are aware of and understand their role in embracing diversity and delivering its aims through access to a portfolio of relevant diversity training material</p>	<p>Continuing</p>	<p>Submit costed training plan for CNPA approval January 2008</p> <p>Delivery of 95% of diversity awareness training to plan</p> <p>reduce current waiting list for diversity awareness to less than 10</p> <p>zero reports to Safecall regarding equality & diversity</p> <p>zero grievances relating to diversity / discrimination issues</p> <p>IIP re-accreditation</p> <p>no negative feedback of diversity issues from exit interviews</p>
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