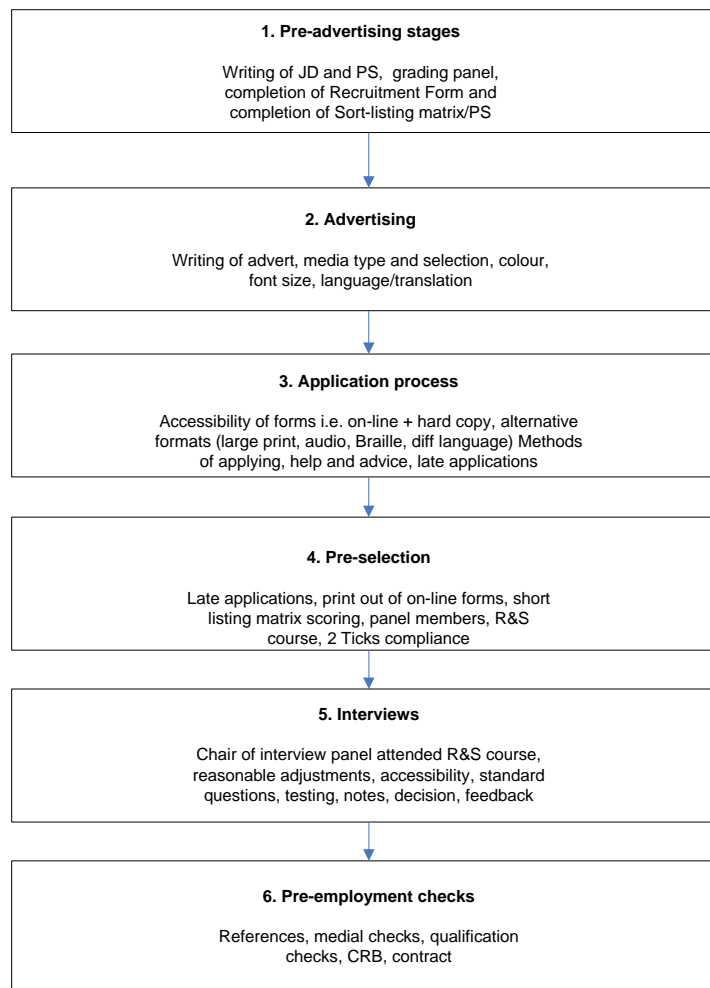


# Worcestershire County Council - Equality Impact Assessment Simplified Desktop Screening on Recruitment & Selection

Completed by Stuart Perkins, Tim Bossenger and Roger Britton on the 11t March, 2008

This exercise is not an Equality Impact Assessment. It is a simplified desktop exercise designed to establish if there is a need to carry out a full assessment. In order to conduct the initial screening of the Recruitment & Selection process, we have broken down the main recruitment process into 6 distinct areas. Please see below.



Other elements that are not included in these 6x stages and that will need to be assessed include:

- Content and accessibility of 'Information for Job Applicants'
  - Stand and literature at Jobs and Careers events
  - Information provided by HUB CSA's on telephone
- Recruitment & Selection course content and delivery

<b>Part One:</b> basic information needed to identify the policy/function and to prepare for the screening.		
1.1	Directorate and Section/Unit.	Corporate Services - Central Recruitment Team within Central Human Resources
1.2	Title or brief description of the policy/function being screened.	EIA on Recruitment & Selection process
1.3	To which section of the Directorate or Corporate “business/service plan” does this relate?	Human Resources and the Central Recruitment Team
1.4	Are there any related policies/functions? If so what are they?	
1.5	Screening carried out by	Stuart Perkins and Tim Bossenger, supported by Roger Britton and Bridget Clark
1.6	Date of screening	
1.7	What is the policy or function trying to achieve?	Ultimately, Worcestershire County Council wants a recruitment and selection process that is open, equitable and fair to all people that apply for its vacancies and ultimately pass through the recruitment process. It is essential that the Recruitment & Selection process and policies in no way discriminate or put any individual of group of people at a disadvantage. This is also based on specific feedback gained from consultation events with the BME groups over the past 2 years. Legislation has also changes and been updated since the last Recruitment & Selection Policy was written. Furthermore the population of Worcestershire has become more diverse and will continue to do so over future years
1.8	What are the specific outcome measures?	More diverse applicants and ultimately employees in Worcestershire County Council. Less ET's on the ground of racial, disability, sexual (gender and orientation), age discrimination. Positive feedback from consultation events in future.
1.9	Who is formally responsible for ensuring the delivery of this policy/function?	Bridget Clark
1.10	Who is responsible for leading the delivery if different from 1.9?	Stuart Perkins and Tim Bossenger
1.11	Are there any priorities within this policy/function? If so what are they?	To get a new updated application form in use and to re-define the 2 Ticks commitment and policy and guidance to managers, including training and monitoring to ensure compliance
1.12	Has any consultation, explicitly on the policy/function, taken place? If so who was consulted and when?	Over the past 3 years, there have been several consultation events with members of the BME groups across the county. A document called ‘You Said, We Will’ will be relevant terms of reference
1.13	Is equality monitoring in place for this policy/function?	Some ad-hoc spot checks take place on applicants not short-listed for interview. These spot checks are currently based on people with a disability, although some basic checks have taken place on the ethnicity of applicants.

## **PART 2.**

**In order to complete a full initial screening, we shall now follow part 2 on each of the six individual elements of the process**

## 1. Pre-advertising stages

**Part two:** the test to see if further action is required. For the purpose of this exercise concentrate on the impact on people of differing race, sex, disability, age, religion or belief and sexual orientation.

	Yes	No	Details
2.1		√	Although it has highlighted some areas of that may require closer assessment in 2.2, 2.3 and 2.4
2.2	√		Currently there is a poor awareness amongst recruiting managers and some HR staff of the required content and legislative requirements, specifically relating to the content of Person Specifications. The problem is most prevalent in existing posts, as new posts go through grading panel who pick-up most issues. CRT and local HR teams do 'police' the content where possible. The risk is highest where recruiting managers hold the copy of the JD and PS and re-use (sometimes after making their own amendments) to re-recruit Note: Recommendation is that of best practice in ACS where HR managing all JD & PS's
2.3		√	
2.4	√		The perception of the public and specifically the BME communities is that the County Council is institutionally racist and a close shop (jobs for the boys analogy etc). We are trying to address this with some examples of targeted media campaigns i.e. The Vine Magazine (Worcestershire public sector supplement to go-live this Summer), targeted poster and flyer campaign for vacancy across BME groups and of course the community fairs that took place last October and will do so again this year. Also work experience started with member of BME community in HR to give full insight etc



If the answer to any of these questions is yes or "could be yes" then you **must** take action. If the issue is straightforward remedy it **now** so the answer changes to no. If it cannot be remedied now or there are outstanding issues you should go on to a full EIA.

## 2. Advertising

Part two: the test to see if further action is required. For the purpose of this exercise concentrate on the impact on people of differing race, sex, disability, age, religion or belief and sexual orientation.				
		Yes	No	Details
2.1	Is there any way in which the policy/function is directly discriminatory or in breach of the Council's Equality and Diversity Policy?		√	Although it has highlighted some areas of that may require closer assessment in 2.2, 2.3 and 2.4
2.2	Are there any barriers to people from minority groups getting the full benefit of this policy/function which have not been resolved as part of the policy/function?	√		Advertisements are based on the Job Description and Person Specification (see 1. Pre-Advertising Stage) which recruiting managers write or interpret, so there is a risk that an advert could contain wording or criteria that could act an indirect barrier. CRT and TMP are there to do some 'policing' and screening of advert content, but in many cases HR are not involved. Recent example of advert and specifically the Person Specification stating a degree in marketing, but no 'or equivalent' was stated in either. It turned out that only 1% of BME economically active in UK have this qualification. At consultation events, BME community representatives have said we don't advertise in the specific press they read. We are addressing this as per notes in Section 1 - 2.4 With COMB and Corporate Equalities Board backing, we can commence positive action in terms of targeted advertising. Potentially this could be selecting high profile BME media for all posts above PO1 in order to attempt to increase % of BME employees in top 5% of earners within organisation
2.3	Are there any other ways the policy/function could unintentionally deliver poorer quality outcomes for individuals because they were members of a minority group?		√	See above 2.2 notes
2.4	Could people from minority groups reasonably believe that they would be likely to get poorer benefits from the policy/function?		√	



If the answer to any of these questions is yes or "could be yes" then you **must** take action. If the issue is straightforward remedy it **now** so the answer changes to no. If it cannot be remedied now or there are outstanding issues you should go on to a full EIA.

### 3. Application Process

**Part two:** the test to see if further action is required. For the purpose of this exercise concentrate on the impact on people of differing race, sex, disability, age, religion or belief and sexual orientation.

		Yes	No	Details
2.1	Is there any way in which the policy/function is directly discriminatory or in breach of the Council's Equality and Diversity Policy?		√	The organisation offers translation services via Ethnic Access Link, as well as other alternative formats i.e. large print, audio tape, Braille. There's also the Worcestershire HUB who take calls via call centre between 8.30am and 6.00pm Monday to Friday and who can offer support and advice or refer to CRT. For those that don't have internet access then as well as the 765765 number staffed by the HUB, there is free internet access at libraries and contact centres. All jobs advertised by Job Centre Plus. Hard copy and email Job Opps For You sent out weekly. CRT also attends all consultation events/community fairs etc in order to give support and advice
2.2	Are there any barriers to people from minority groups getting the full benefit of this policy/function which have not been resolved as part of the policy/function?		√	As above
2.3	Are there any other ways the policy/function could unintentionally deliver poorer quality outcomes for individuals because they were members of a minority group?		√	As above
2.4	Could people from minority groups reasonably believe that they would be likely to get poorer benefits from the policy/function?		√	As above



If the answer to any of these questions is yes or "could be yes" then you **must** take action. If the issue is straightforward remedy it **now** so the answer changes to no. If it cannot be remedied now or there are outstanding issues you should go on to a full EIA.

#### 4. Pre-selection

**Part two:** the test to see if further action is required. For the purpose of this exercise concentrate on the impact on people of differing race, sex, disability, age, religion or belief and sexual orientation.

		Yes	No	Details
2.1	Is there any way in which the policy/function is directly discriminatory or in breach of the Council's Equality and Diversity Policy?	√		Following recent spot-checks instigated by the CRT and Sandy Bannister, Disability Equality Advisor and the outcome of an Audit on R&S, it has been identified that the organisation's Two Ticks commitment is not as effective as it should be. As a result urgent remedial action has commenced at the time of the EIA. The confusion is internal across the organisation based on inconsistency of interpretation. As a result HR, trainers (on the R&S course) and recruiting managers have different understand of what their obligation to the commitment actually is. This has resulted in some applicants with disabilities not being interviewed when they should have been and also some interviewed when they didn't meet the criteria. <b>Please see summary for proposed actions</b>
2.2	Are there any barriers to people from minority groups getting the full benefit of this policy/function which have not been resolved as part of the policy/function?	√		The short-listing process i.e. the scoring of each criteria on the Person Specification is hugely subjective with some generous markers and others harsh. Also, potentially meets, fully meets or exceeds are not easily definable. Also from previous consultation events the public and specifically members of the local BME communities has raised concerns that recruiting managers discriminate purely on seeing the name, address and date of birth. As a result of this a new style application form is being investigated which will remove some or all of these elements from view of recruiting managers at the short-listing stage. Again Audit picked up on this stage of the process as a weakness and have made recommendations in a soon to be published report to Kenny Brown. <b>Please see summary for proposed actions</b>
2.3	Are there any other ways the policy/function could unintentionally deliver poorer quality outcomes for individuals because they were members of a minority group?		√	See above
2.4	Could people from minority groups reasonably believe that they would be likely to get poorer benefits from the policy/function?		√	See above



If the answer to any of these questions is yes or "could be yes" then you **must** take action. If the issue is straightforward remedy it **now** so the answer changes to no. If it cannot be remedied now or there are outstanding issues you should go on to a full EIA.

## 5. Interviews

**Part two:** the test to see if further action is required. For the purpose of this exercise concentrate on the impact on people of differing race, sex, disability, age, religion or belief and sexual orientation.

		Yes	No	Details
2.1	Is there any way in which the policy/function is directly discriminatory or in breach of the Council's Equality and Diversity Policy?		√	Simply based on the interview process being a natural form of discrimination i.e. narrowing down a number of potential candidates to one, it is difficult to say no, however, the process is the same for all candidates i.e. the managers in principal should be interviewing only against the candidate's ability to do the job as laid out in the Job Description and Person Specification. However, there are risks associated – see 2.2
2.2	Are there any barriers to people from minority groups getting the full benefit of this policy/function which have not been resolved as part of the policy/function?	√		Not all recruiting managers have completed/obtained their Certificate in Recruitment Practice and the CRT are not able to ensure this is the case, before a manager potentially heads up an interview panel. In the absence of such training, the interview process is high risk, so combining these two facts, it is essential that action is taken to improve the skills and knowledge of recruiting managers who complete interviews of candidates <b>See summary for proposed action</b>
2.3	Are there any other ways the policy/function could unintentionally deliver poorer quality outcomes for individuals because they were members of a minority group?	√		See notes above
2.4	Could people from minority groups reasonably believe that they would be likely to get poorer benefits from the policy/function?	√		See notes above



If the answer to any of these questions is yes or “could be yes” then you **must** take action. If the issue is straightforward remedy it **now** so the answer changes to no. If it cannot be remedied now or there are outstanding issues you should go on to a full EIA.

## 6. Pre-employment checks (Medical questionnaires MRF1 and 2, Qualification checks, References, CRB – where appropriate)

Part two: the test to see if further action is required. For the purpose of this exercise concentrate on the impact on people of differing race, sex, disability, age, religion or belief and sexual orientation.				
		Yes	No	Details
2.1	Is there any way in which the policy/function is directly discriminatory or in breach of the Council's Equality and Diversity Policy?		√	We could not see any way in which the pre-employment checking process would in any way detrimentally affect, nor have an impact on people of differing race, sex, disability, age, religion or belief and sexual orientation.
2.2	Are there any barriers to people from minority groups getting the full benefit of this policy/function which have not been resolved as part of the policy/function?		√	As 2.1
2.3	Are there any other ways the policy/function could unintentionally deliver poorer quality outcomes for individuals because they were members of a minority group?		√	As 2.1
2.4	Could people from minority groups reasonably believe that they would be likely to get poorer benefits from the policy/function?		√	As 2.1
		↓	→	If the answer to any of these questions is yes or "could be yes" then you <b>must</b> take action. If the issue is straightforward remedy it <b>now</b> so the answer changes to no. If it cannot be remedied now or there are outstanding issues you should go on to a full EIA.

## **Summary:**

Through the completion of this desktop screening exercise, we have highlighted a number of areas that require immediate action and specifically the 'Two Ticks' commitment. Also, since the screening exercise, a number of updates can be provided on initiatives started and on-going as follows:

### **Short-listing**

The CRT will soon launch a combined Person Specification and Short-listing matrix. This will force recruiting managers to complete the weightings for each criteria on the Person Specification before advertising. This will help prevent managers adding weightings in order to preclude candidates once they have viewed their applications. Also by having this documentation prepared at the beginning of the recruitment process, CRT and HR (in some cases) can interrogate the weightings (initially through spot checks) to ensure they are fair and won't potentially preclude any person or group etc

### **Two Ticks progress**

Since the desktop screening process, I have worked closely with Sandy Bannister and consulted with John Blenkiron, Bridget Clark and Ian Birchmore in Audit and between us we have come up with some improved instructional text that can formulate a re-launch of the Two Ticks commitment. We will work with training and comms in order to deliver this across the organisation and ensure a clear and consistent process, which will ultimately rule out any detrimental treatment of candidates with a disability. The new proposed text is:

*'In line with our commitment to the 'Two Ticks' Disability Symbol, you must take additional care to ensure that you assess disabled applicants according to their abilities. You need to interview all applicants who have a disability who demonstrate in their application, that they meet the essential criteria, by scoring 1,2 or 3 against all of the criteria stated in the Person Specification.*

*In addition, where an applicant with a disability scores '0' against any of the essential criteria, you must check to ensure that the criteria is essential and has not been specified in a way which causes unjustified disadvantage to a disabled applicant, compared to the applicants without a disability.'*

### **Application form – anonymity**

Based on feedback from BME groups we are looking to remove name, address and date of birth from the front of the application form. This would potentially prevent recruiting managers from knowing the applicant's gender, race or age when conducting short-listing. This work is on going as an analysis is under way to see if there is sufficient infrastructure and resource within CRT to effectively manage this process. Working purely on applicant reference numbers will increase the risk of mistakes i.e. the wrong people being invited for interview, but also anonymous application forms will prevent recruiting managers from being able to complete identity checks at interview. With the current IT infrastructure, the process of separating and ultimately then re-attaching and providing personal details at interview stage would be entirely manual and thus create a huge burden on the CRT.

### **Interviews**

The CRT together with Karen Clulow in Training is going to devise a new ½ day intensive training course on interviewing. This will supplement the Recruitment & Selection course. It is also proposed that the Equality & Diversity Team currently based in ACS are relocated to work within Central HR. This being the case, then the two can potentially work more closely together to ensure that sufficient awareness of equality and diversity is obtained and maintained by recruiting managers. Areas of concern can be flagged up by both teams and be swiftly acted upon.

We will also look to try and prevent recruiting managers chairing interview panels if they haven't attended the Recruitment & Selection training course. We can look to add a box to the initial Recruitment Form where the recruiting manager will have to tick 'Yes' or 'No' as to whether they have attended the course. Also, we may ask for the date when they attended the course, or refresher course.

**Other elements that are not included in these 6x stages and that will need to be assessed include:**

Content and accessibility of 'Information for Job Applicants' – The new version is now finalised and will be published w/c 21<sup>st</sup> April

Stand and literature at Jobs and Careers events – Under review to ensure it will provide clearer idea of diversity of opportunities available to all

Information provided by HUB CSA's on telephone – Review planned

Recruitment & Selection course content and delivery – On-going development and review

**Next steps....**

We now need to prioritise the actions outlined in this summary and set timescales for completion against each.