



# Equality Impact Assessment Summary

## Summary

**Name of Product** Cleveland Police Dress and Appearance Policy

**Description of Product**

This policy applies to everyone who works for or on behalf of Cleveland Police - all Police Officers both in uniform and non-uniform roles, police staff, special constables, cadets and volunteers. Uniform is provided in various roles and whilst this policy deals with the general principles of uniformity, every reasonable effort will be made to accommodate variations in uniform for religious and cultural reasons.

Where non-standard items of uniform are authorised and issued for particular duties or for specialist role, the items may not, as a matter of course, be worn for other duties or as a substitute for standard uniform.

**Department** Uniform and Equipment User Group

**Assessment Writer** Rachel Stockdale

**Date Started** March 2020

**Head of Dept Sign Off** ACC Orchard November 2020

**EDI Manager Sign Off** Jenni Salkeld Feb 2021

**Review Date** See policy review date

## Version Control

This is a living document and should be updated as we update our products, and receive new insights and data on how our people or communities engage with our product.

Version	Date	Reason for update	Author
2	11/01/2021	Transferred into new EIA template to support policy writer.	Jenni Salkeld
2.1	02/03/2021	Updates to reflect work undertaken to understand and minimize impacts further.	Rachel Stockdale

## Stage One – Early Thinking

Use this space to confirm if you are developing a proposal that will impact upon policies and practices that are likely to impact upon our communities or workforce. Consider If you aren't sure how your product may impact people due to their protected characteristics please use our **Equality Consideration Checklist**.

Is an EIA required at this time?	Yes
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If no, what is your rationale?	N/A
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## Stage Two – Identify Scope

You must list the specific sources of evidence that you have used within the EIA to ensure your product is inclusive. Please including links to any sources and details of any consultation work you have undertaken.

### Changing Workforce Demographics

Due to Operation Uplift our Initial Response Teams have recently welcomed a significant number of new student officers, these new joiners are noted to be from more diverse backgrounds than our existing workforce. From Uplift data monitoring we see that 2.2% of our established workforce identifies as BAME, 4.6% of new joiners were from BAME backgrounds. Similarly, 30% of our established workforce identifies as female, however 43% of new joiners identified as female. [Police officer uplift, quarterly update to December 2020 - GOV.UK \(www.gov.uk\)](http://www.gov.uk) New joiners are also noted to be from younger age groups than our established workforce. Consultation around this policy has been as inclusive as possible to ensure that all views are sought, the policy is bench marked with other forces and is in keeping with the image and reputation of Cleveland Police.

### Consultation & Bench Marking

Consulted with Cleveland Police Staff Networks: Autism Association, LGBTQ+ Network, Women's Network, Christian Police Association, Support Association for Minority, Ethnicity Staff (SAME), Disability Support Network and Vegan Network. Feedback has been provided by all groups and all comments have been considered and included where possible.

Consultation has also occurred with Cleveland police officers and police staff which was then overlaid with consultation with Unison, the Police Federation and health and safety representatives

Policies from various forces throughout the country have been reviewed to bench mark other forces views and values around dress and uniform. Policies from forces such as Thames Valley, West Yorkshire, Merseyside and Dorset as well as our local neighbouring forces of North Yorkshire, Durham (be it part of their code of ethics policy) and Northumbria.

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I have also consulted and been cognisant of guidance from College of Policing and NPCC literature.

During the local consultation phase the following issues were raised from the initial draft.

Wording around the **warrant and identity cards** have been changed to include the suggested wording from the consultation.

The feedback around **woollen hats** has also been noted but there are no plans to issue these or revert to bump caps. The tradition headgear will continue to be issued therefore has been left within the policy.

The **badges, pins** etc. have been included in the policy to be more inclusive and support chosen charities and organisations

**Rainbow epaulettes** have been included as these are available to any officer on request and were omitted.

### **Hair**

There were several people provided suggestions and feedback around hair. Whilst your comments around hair colour and style have been discussed – the policy will remain on hair colour and style. That is not in any way restricting people outside of work to wear their hair as they wish, this is just the requirement whilst at work. This has been bench marked with other police forces' policies.

The reason it is in a low bun is so the officers and PCSOs can wear their hats. If it remained just stating 'off the collar' it leaves it open to being worn on top of the head or in any other style. The view is that everyone wears their hair uniformed.

The comments around pigtailed, bunches and the need for buns for operational staff is based on a health and safety issue as such loose flowing items are easily pulled or held during confrontational situations based on experiences of forces throughout the UK.

Just to clarify that the Organisation / Executive will decide what is a conventional hair style and would be impossible to cover all on a blanket comment. Unnatural colours will be any colour that is not a colour that hair naturally grows.

The section including cultural and religious hair styles is to be added once the consultation with the EDI team has agreed wording

The wording around **tattoos** and what can be offensive has been bench marked with other forces and is in line with the policies from other forces.

The **socks** can be seen over boots and shoes, especially when people are seated. This is the reason they need to be in keeping with the uniform and should be black or navy blue. Other brighter colours would not look uniformed.

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**Facial hair / designer stubble** has been bench marked with other forces and is not deemed as being in keeping with the forces professional image it is looking to convey.

In relation to beards – those with longer beards are expected to tie up beards in a certain way the same as people with long hair are expected to tie their hair back however the policy has been amended to allow the growing of beards etc for an individual need such as health reasons or charitable events.

**Nail varnish** – the policy has been changed to include the suggestion that all should wear neutral colours

**Jewellery** – the policy has been changed to include the suggestion of including charity bracelets

Your comments around **adaptation of uniform** are noted and have been included in the policy as consultation highlighted that people may adapt their uniform thus not making it uniformed

**In relation to belts** – it is a national uniform and ordered according therefore a leather belt or a vegan substitute has been included in the policy

**Utility belt** – the policy has been changed to include the adding of a personal multi tool to the equipment that can be added and carried

**Pins** have been included for everyone as initially this was only for CI and above referring to tie pins but the policy has been amended for all to wear pins that support charities and organisations.

The list for control room staff uniform is still under review but can be added once finalised exactly what uniform they will be issued with.

**Business attire is the dress for all departments throughout the force.** All departments will be expected to dress to this level every day they are on duty. The policy is specific on what business attire means in order to project a professional image. There is the exemption of when operational policy dictates the need to dress - Officers engaged in covert operations will dress appropriately for their particular role or operation as directed by their Leadership team. When not engaged in this activity or operations the general standards of agreed non uniformed staff of business attire will apply.

**Sunglasses** are accepted to be a necessity for some regarding driving, cycling etc. based on a health and safety need however they are not to be worn when on general foot patrol, community events etc. which is what the policy covers. I have tried to add wording that makes this clearer based on the feedback.

**Cadets and Volunteers** if working with or on behalf of Cleveland police will be expected to maintain the same standards set of everyone else within Cleveland police and will be enforceable.

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The policy has also worked with the EDI team to ensure inclusivity as well as maintaining a uniformed approach. The policy has been amended and written where required to also ensure the professional image of the force in line with the Executives expectation and Cleveland's Pledge.

### Supporting research to understand standards and impacts:

- [National Standards Guidance](#)
- [Halo code's guidance on hair](#)
- [Movember](#)
- [Stonewall's LGBT in Britain Work Report](#)

Stage Three - Impact	
What potential positive or negative impacts has your research and consultation revealed?	
Age	
Positive Impacts	Negative Impacts
Due to the changing demographics of the organisation application of the policy is intended to set clear expectations on dress and appearance for staff and officers of all ages, which will contribute to developing a cohesive one team culture.	<p>The standards we set on dress and appearance could potentially dissuade younger applicants from joining our team.</p> <p>Younger officers and staff entering our workforce typically start on lower salary bands, and are likely to be on lower salaries than their older colleagues. They therefore may be disproportionately affected by the need to buy new business clothes that fit the new policy.</p>
Disability	
Positive Impacts	Negative Impacts
Reasonable adjustments can be made on discussion with supervision. For example, use of more casual, comfortable footwear can be authorised by supervision if an individual requires it on medical grounds.	<p>We will work with employees to apply reasonable adjustments, however visible exemptions for people with disabilities could be seen as having the effect of 'othering' them, causing resentment from colleagues, this could also contribute to 'outing' employees with invisible disabilities (e.g. ASD).</p> <p>Potential financial impact: people with certain disabilities may require tailoring for business wear to fit appropriately;</p>

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	<p>this means the policy could have a disproportionate financial impact on employees with disabilities. If alterations to operational uniform are at the individual's expense, this will also have a disproportionate financial impact on employees with disabilities.</p>
<b>Gender Reassignment</b>	
<b>Positive Impacts</b>	<b>Negative Impacts</b>
<p>This policy aligns to our Trans at Work Policy, in which we confirm: if wearing of uniform is required for the role managers will ensure that the trans individual has access to the uniform that is most appropriate at all times. Some trans and non-binary individuals may need access to both male and female uniforms. Managers should be flexible and support the preferences of the person wherever possible. Trans individuals have the right to comply with any dress code in a way that reflects their gender identity and gender expression.</p>	<p>Whilst application of the Trans at Work Policy will support individuals to express and meet their needs they may experience 'outing' and 'othering' by their colleagues when enabled to apply visible exemptions.</p> <p>Potential financial impact: if alterations to operational uniform are at the individual's expense, this could have a disproportionate financial impact on transgender people.</p>
<b>Marriage and civil partnership</b>	
<b>Positive Impacts</b>	<b>Negative Impacts</b>
<p>No positive impacts identified for marriage or civil partnership.</p>	<p>No negative impacts identified for marriage or civil partnership.</p>
<b>Pregnancy and maternity</b>	
<b>Positive Impacts</b>	<b>Negative Impacts</b>
<p>The available maternity options for uniform are outlined within the policy. It is the individual's choice whether they wish to order uniform or wear their own clothing.</p> <p>Use of more casual, comfortable footwear can be authorised by supervision if an individual requires it due to discomfort due to their pregnancy.</p>	<p>No negative impacts identified for pregnancy and maternity.</p>
<b>Race</b>	
<b>Positive Impacts</b>	<b>Negative Impacts</b>
<p>No positive impacts identified for race.</p>	<p>Hairstyles that are fairly commonplace in certain cultures, e.g. dreadlocks and</p>

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	many natural Black hairstyles, may be viewed as not being "clean, neat and tidy" due to bias. Supervision are required to remember that the appearance of "clean, neat and tidy" will vary depending on the natural texture of an individual's hair.
<b>Religion or Belief</b>	
<b>Positive Impacts</b>	<b>Negative Impacts</b>
<p>Vegan alternatives of items, such as belts and boots are available. Items such as Force issue hijabs have been made available as a standard uniform item.</p> <p>If an individual requires other alternative headwear not provided as standard to accommodate religious headwear, options can be arranged through discussion with supervision.</p> <p>Clear guidance is provided to support those wearing and carrying jewellery for cultural, faith or religious belief reasons.</p>	<p>We may not always be able to meet needs straight away with options available to us for items such as headwear, however will work with the individual to find solutions that meet their needs and keep them safe in their role.</p>
<b>Sex</b>	
<b>Positive Impacts</b>	<b>Negative Impacts</b>
<p>Men are permitted to be unshaven if they committed to growing a beard or moustache. This enables engagement with positive activities such as Movember, encouraging men to talk about and take action on key men's health issues such as; mental health and suicide prevention, prostate cancer and testicular cancer.</p>	<p>The guidance provided on make-up and skirt/dress lengths is based on typical professional image guidance, this will predominantly affect women. It is noted that in providing this guidance, supervision must handle the need to provide feedback on non-compliance sensitively and appropriately.</p>
<b>Sexual Orientation</b>	
<b>Positive Impacts</b>	<b>Negative Impacts</b>
<p>Rainbow epaulettes are available for staff who wish to wear them as a member of the LGBT+ community or an ally.</p>	<p>It's common to express LGBT+ identity through hair, make up and clothing. Some staff who identify as LGBT+ may feel restricted from fully expressing their identity at work due to the policy requirements. This could also dissuade some members of the LGBT+</p>

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	community from applying to join our team.
<b>Other – Please clarify</b>	
<b>Positive Impacts</b>	<b>Negative Impacts</b>
No positive impacts identified for any other characteristics.	<b>Social Economic Background:</b> This policy may require existing staff and officers to purchase a significant amount of clothing/footwear. This will disproportionately impact those on low incomes or with significant financial obligations.

Stage Four – Mitigation – Actions		
What can be done to mitigate/minimise negative impacts?		
Action	Action Owner	Action Status
<p><b>Disability</b></p> <p>There is a section built into the policy to cover the need for reasonable adjustment based on disability that will cover the points raised within the EIA.</p> <p>Tailoring of uniform has always been the officer's responsibility and is not new therefore no further impact as a result of this policy.</p>	2845 / ACC Orchard	Complete
<p><b>Gender reassignment – no further actions required. Reasonable adjustments will always be a consideration as stated in the Trans at Work Policy.</b></p> <p>Tailoring of uniform has always been the officer's responsibility and is not new therefore no further impact as a result of this policy.</p> <p>Mitigation built into the policy.</p>	2845 / ACC Orchard	complete
<p><b>Age – it's acknowledged that people will have to purchase clothing but they would be purchasing clothing for life /work in other businesses and therefore no mitigation required.</b></p>	2845 / ACC Orchard	Complete
<p><b>Pregnancy and maternity – there is now a maternity uniform available for order that was</b></p>	2845 / ACC Orchard	Complete



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not available prior to this policy. Sourced and added to the uniform list.		
Race – natural hair colour includes natural hair colour for all. This policy is around inclusivity and reasonable adjustments are made if and when necessary to ensure inclusivity.	2845 / ACC Orchard	Complete
Hair colour – The policy reflects the need to support the public in professional manner to increase confidence and satisfaction in the communities we serve through that corporate image set by national standards. Its agreed therefore hair should not be dyed conspicuously unnatural colours. To embed a one culture policing family between police officers, PCSO's and police staff it is important to ensure there is a set standard for all whether front facing or back office.	ACC Orchard / CC	Complete
Religion / belief Inclusion of alternative options around leather Hijab included in the uniform list however specific mention of clothing required to be purchased and can be refunded within the policy. Clothing for modesty is included if still remains within the corporate image of dress (for example, leggings under skirts).	ACC Orchard / 2845	Complete
Sex There are restrictions on appearance and dress that gives specific guidance to both women and men. Unconscious bias could be perceived by not giving such clear guidance. Included section for guidance if required in the policy.	2845 / ACC Orchard	Completed
Sexual orientation Guidance within the policy will provide guidance on all of society regardless of sexual orientation. Alternative hairstyles are not restricted to those who identify as lesbian, gay, bisexual or otherwise not heterosexual however provides clear guidance on the standards expected whilst at work. Wording around pins altered.	2845 / ACC	Completed



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<p>Other – Reflect on the financial implications: Throughout the EIA we have identified there may be some financial implications for our workforce. There may be a need to purchase some clothing for some individuals, but there is not a need to purchase significant amount of new clothing and footwear. The majority of our workforce are already wearing clothing aligned to this policy at present. Officers requiring business attire already have such clothing for court purposes. There is support available and advice financially available if people find this problematic.</p>	<p>2845 / ACC Orchard</p>	<p>Completed</p>
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<h3>Stage Four – Mitigation – Risk Tolerance</h3>	
<p>Have we exhausted options to mitigate/minimise any negative impacts? List negative impacts we have not been able to mitigate here.</p>	
<p>Impacts we cannot mitigate</p>	<p>We acknowledge that personal and professional identity are intrinsically linked. The introduction of this policy to achieve alignment with the standards set nationally to keep our staff safe, easily identifiable and looking professional may limit some aspects of personal choice whilst at work or in our employment. We will ensure clear, consistent communication for our workforce and supervision to adopt these requirements. From our research we also believe that implementing the policy also offers us an opportunity to improve consistent application of uniform reasonable adjustments for those who require them, as well as promote an inclusive one team image and culture for our growing workforce.</p> <p>We will continue to monitor and respond to the changing needs of our workforce through our Equipment and Uniform User group. The group will continue to provide support to ensure our people receive the right uniform and equipment for them and avoid unlawful discrimination.</p>
<p>Does your head of department approve of tolerating this risk?</p>	<p>Yes – ACC Orchard</p>

### Stage 5 – Sign Off

Once you have completed your assessment and product you must request your head of department sign them off. You then need to send your completed EIA summary and



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the product you have assessed to the EDI team:

[everyonematters@cleveland.pnn.police.uk](mailto:everyonematters@cleveland.pnn.police.uk)

The team will review your EIA and will either: provide final sign off the completed document, OR, return your document with further considerations and recommendations for you to implement.