

MPS Equalities Scheme – 2009 Annual Review

Progress on action plan objectives

Summary

The MPS Equalities Scheme (ES) and action plan was published in December 2006, with additional sections subsequently added between that time and May 2008. Progress has been reported upon through annual reports, particularly in terms of Disability in 2007/8 and of Gender in 2008. This report provides an update on the progress made in delivering all the objectives across all the equality strands. This document is in addition to the information detailed within, and should be read in conjunction with, the ES and the Annual Reports available at: http://www.met.police.uk/dcf/equality_stm.htm

The Scheme is designed to improve equality for all and in particular enable our staff to provide improved services to Londoners. It is the intention of the Scheme that improvements and progress made within one diversity element will provide benefits for all others. Responsibility for implementing the objectives is shared across the MPS but the governance arrangements are overseen and monitored by the Diversity and Citizen Focus Directorate (DCFD).

The MPS Equalities Scheme Programme Board has strategic oversight for the delivery of the action plan work programme. During 2008/9 a review of the whole action plan has been underway. Assisted by the DCFD, each owner has reviewed the ongoing appropriateness of each objective. The aim has been to clarify them, remove duplication and make them more suitable for delivering operational change within the organisation. This report details progress made within the context of the new refined plan.

OBJECTIVE C1

Lead: Assistant Commissioner Territorial Policing

Each MPS OCU Head

Develop and implement the Equality Standard for the Police Service

An Equality Standard for the Police Service is an essential tool to help embed equality and diversity into every part of policing activity – operational and corporate. Through the effective involvement and engagement of the workforce, communities served and partners the Met will be better placed to deliver its promises to the people of London.

The Metropolitan Police Service is currently working in partnership with National Policing Improvement Agency (NPIA) to develop an Equality Standard for the Police Service. This Standard is specifically designed for the Police Service and will be brought into use within the Met in late autumn 2009. All 43 Police Services across England and Wales along with the Ministry of

Defence and British Transport Police are involved.

Within the MPS a three-month field trial is underway from April across Enfield, Greenwich and Richmond BOCUs and the Resources, Public Affairs and Professional Standards Directorates.

The Standard now contains just 25 criteria for each of the three stages (Baseline, Developing and Good Practice) and the field-testing will examine the possibility of further reductions. In comparison, the newly launched 'Equality Framework for local government' (EFlg) has 29 criteria.

The Equality Standard contributes to improving core business delivery and every business area in the Met will be involved. It does not replace equality legislation but provides a means of collating evidence to show how far the MPS has exceeded mere legal compliance. It is not a prescriptive 'how to' document because it must be flexible enough to allow for different policing conditions and policing priorities. After implementation, an Editorial Board of NPIA and representative Police Services will continue to ensure that it is updated and remains challenging.

The 3 main sections are – Community and Customer Focus, Crime Impacts Focus and Organisational Focus. Knowing the internal and external customers and improving customer service is also a strong theme throughout the Standard. Activity to be evidenced for the initial 'Baseline' stage should already be taking place and potential documents to be cited as evidence include local policing plans, impact assessments, evaluations of deployments and investigations, minutes of meetings with communities; partnership activities and Annual Reports. There is detailed guidance and an optional, easy-to-use, IT Evidence Capture System.

In keeping with other equality standards, it progresses through three stages. The first, 'Baseline', must be met for HMIC's 2010-11 inspection. As the first standard of its type it needs to set that baseline and also control the second stage – 'Developing'. That stage checks that appropriate activity has been fully integrated and then the third stage, 'Good Practice', looks at outcomes. It was recognised early on in the project that an emphasis on outcomes at all stages risked Police Services not being able to audit their activity fully. The last stage emphasises replicating 'what works', thereby getting best value from resources. The NPIA will facilitate sharing of good practice throughout the life of the Standard.

The MPS is adopting a Standard to:

- improve overall performance and contribute to community confidence
- integrate police equality activity across all business areas
- demonstrate activity and outcomes beyond basic legal compliance
- build organisational capability via a diverse workforce, better reflecting communities served
- support bench-marking and spread good practice (saving resources)
- reflect delivery partners' use of standards appropriate to their business

- support HMIC as part of its 2010-11 workforce inspection
- support Police Authorities in local target setting, etc.

The Standard's three sections therefore focus across these aspects:

- equality for all, not just 'strands' in legislation
- community engagement
- improving service design and delivery overall
- being able to treat people according to need
- closing gaps in satisfaction levels
- responding to local concerns
- attracting, retaining and developing a skilled and diverse workforce reflecting communities served
- integrating equality activity across all business areas.

The Standard has been developed to connect to strategic policing and Government priorities and is supported by ACPO Cabinet. It:

- supports delivery e.g. National Policing Plan and National Community Safety Plan; Citizen Focus and Neighbourhood Policing; Policing Pledge; National Intelligence Model; etc.
- supports delivery of all relevant Government Public Service Agreements
- helps drive improvement in equality of recruitment, retention and progression
- links to forthcoming NPIA guidance e.g. People/Leadership Strategies, HR Standard
- links to forthcoming Tripartite Equality Strategy and new legislation
- aligns with the European Framework for Quality Management and Business Excellence Model.

The Equality Standard incorporates a transparent and fully documented verification process with three stages - self-assessment, community/partner assessment and then peer-assessment. The second stage establishes a new layer of community engagement and should contribute to building community confidence.

The Standard sits at a strategic level above day-to-day equality activity within the MPS and other Police Services. Evidencing it will be a matter of familiarisation and does not rely upon users undertaking any form of training to run the Standard – it is easy-to-use. This improvement tool is designed to help change culture in a logical way as it embeds into the Met in real time. All business areas will do gap analysis and then format action plans for improvement as is standard practice. Where business areas within the Met have been taking an annual and reactive approach to gathering evidence on equality activity, this new proactive approach should save on resources and reduce service disruption as well as enabling the assessment of performance at any time during the year.

OBJECTIVE C3

Lead: Assistant Commissioner Territorial Policing

To develop the Equality Impact Assessment process

The Equality Impact Assessment (EIA) Policy, Standard Operating Procedures (SOP) and Form 6119A were published in December 2006 alongside the initial publication of the ES. The policy has delivered positive results: all corporate polices undergo the EIA process, with arrangements for three-year reviews and annual monitoring for each assessed policy successfully in place. These can be accessed at: http://www.met.police.uk/foi/az_index.htm

Completed corporate policy EIAs are quality assured by the DCFD, who also offer advice during the process itself.

The EIA Policy is broad in its concept, aiming to impact assess a very wide range of activities. This has proved difficult to implement across the MPS in a consistent fashion. An EIA sub-group of the ES Programme Board is reviewing the entire process during 2009 and will propose amendments.

As part of the monitoring of the EIA Policy, feedback from Policy writers and others have suggested several improvements. These include the need to:

- simplify the form, particularly the screening process (a simpler form has been piloted during the 2008 Territorial Policing planning processes for BOCUs)
- comply with the mandatory requirement to engage, consult and involve stakeholders in EIAs
- provide relevant training (training workshops have been held, with mixed success) and assistance.

Other potential developments under examination are:

- An electronic toolkit, with assistance provided through Intranet links, to more effectively embed the process
- A scoping of the quality assurance, monitoring and governance aspects of the process, including required staffing capacity and competence.

OBJECTIVE C5

Leads: Internal - Director Human Resources

External - Assistant Commissioner Territorial Policing

The implementation of monitoring processes, which encompass all six diversity strands

Corporate Framework

A corporate level performance management framework for diversity and equality has been developed and is used by the MPS Diversity Board at its meetings. The framework encompasses all six diversity strands and reports on performance in both service delivery and employment practices.

An exception based performance report is presented to Diversity Board at each of its meetings, allowing the Board to consider both the effectiveness of monitoring processes for diversity and equality across all business areas and current performance issues, thereby enabling the Board to commission further work or initiate improvement activity as necessary.

Business Groups are encouraged to ensure that diversity and equality issues are encompassed in their performance management processes. For example, the Crime Control Strategy Meetings (CCSMs) form an integral part of the performance management regime within Territorial Policing, providing a rolling programme of thematic performance meetings where Borough Commanders are held to account on performance in specific areas. DCFD worked in partnership with the TP Performance Unit to introduce diversity and equalities into the CCSM programme in November 2008, culminating in a Showcase event in January 2009, providing an opportunity to showcase good practice that exists on BOCUs. Other business groups are considering the applicability of this approach.

The performance reports considered by Diversity Board examine the extent and effectiveness of monitoring regimes across business areas. Recommendations are made to enhance monitoring as required. For example, monitoring of sexual orientation has now been included in the User Satisfaction Survey; work has been undertaken to improve the completeness of the monitoring information recorded in relation to public complaints.

The agenda for Diversity Board has been reviewed to include a rolling programme of updates from each MPS Business Group on the delivery of their diversity and equality strategies. These updates provide opportunities for business groups to recognise good practice that has been developed locally, providing a mechanism for this to be shared with colleagues across the organisation.

This objective is largely delivered and the issue is now about ongoing delivery and development.

Employment

The MPS is committed to being an Employer of Choice, valuing staff, building trust and confidence in becoming more representative of the communities we serve. In adopting an inclusive and secure approach to diversity monitoring, through the confidential self-service 'My Diversity Data' field within MetHR, we will be able to capture the workforce diversity profile and design initiatives that better deliver fairness and equality. Launched in 2007, the field captures information related to disability, religion, faith or belief and sexual orientation.

Access to this data is restricted to a limited number of named users within MetHR, who have responsibility for maintenance of the system; the information in this screen is not available to anyone else. Any publication of diversity workforce information collected from this screen is published in a non-attributable way. That is to say, that the information published will not identify an individual or lead to any individual being identified. Protocol dictates that information cannot be released without the authority of the Strategic Director, Organisational Development, HR.

The field provides the opportunity for analysis of representation across the organisation in relation to all diversity strands, and the potential to target intervention through evaluation against Human Resources (HR) areas, such as promotion, progression and those exiting the organisation. This analysis is only conducted with appropriate sized samples to ensure that individuals are not identified; therefore work continues to increase completion rates and functionality. In doing so, the HR Organisational Development Team is currently in the process of consultation with key stakeholders to gather feedback in relation to improvements. Alongside this consultation process messages encouraging staff to complete the screen have been regularly included in various communication mechanisms. This initial work has seen completion rates increase from 1,500 in January 2008 to over 5,500 in January 2009.

OBJECTIVE C6

Lead: Director Resources

To ensure equality is embedded into all procurement and tender specifications and contract processes

Issues relating to Equality in Procurement fall under the banner of responsible procurement within the MPS. A great deal has been done by the MPS on its own and in conjunction with our colleagues in the GLA in the last few years such as:

- the adoption of the MPS of the GLA Sustainable Procurement Policy in 2006
- the use of scored qualifying questions, on bidding organisations, in areas such as policies and working practices on equality, diversity, sexual orientation, trade union recognition, etc. as part the MPS Outsourced Services Retendering Program
- the adoption of the London Living Wage in our Facilities Management Services contracts at a cost of £3m+ per annum to the MPS
- The achievement of silver status in the Mayor's Green Procurement Code (MGPC)
- The introduction of a programme to pay small and medium-sized enterprises (SMEs) within 10 days
- Formation of and budgetary support to a GLA Central Responsible Procurement team

- the introduction of standard terms forcing the mandating of certain standards within our contracts - see **Appendix 1**.

These successes have been built upon by a new 4 year responsible procurement plan which was approved by the MPA in January 2009 and available at: <http://www.mpa.gov.uk/committees/finres/2009/090122/09/>

The new plan contains a whole host of initiatives such as promoting the Diversity Works for London Implementation toolkit, introducing a tool to monitor the ethical practices of any of our suppliers who manufacture overseas, increasing the importance of equality issues in supplier selection and examining the use of the website 'Competefor' (<https://www.competefor.com/london2012business/login.jsp>), dedicated to advertising opportunities to small businesses. These targets support the overall GLA plan and such current Mayoral initiatives as the London Economic Recovery Action Plan.

OBJECTIVE C7

Lead: Director Public Affairs

To ensure that public access to our information and data about all our services is inclusive, open and effective

Any information or services provided by, or in consultation with, the Directorate of Public Affairs (DPA), are made accessible. The DPA continues to use a wide range of media to inform the public of our services and information and adhere to our own guidance in respect of accessible formats. The DPA can and does provide guidance to other business groups on how information and data should be accessible. Such information and guidance is readily available on the DPA intranet site.

OBJECTIVE C8

Lead: Assistant Commissioner Territorial Policing

To ensure the opportunities for people to report crime through 'Third Party', Assisted or Online arrangements are accessible and relevant to people's needs.

The following activities or points support crime-reporting processes:

- Third Party Reporting Guidance has been redeveloped for promulgation to Boroughs.
- A scoping exercise was conducted to ascertain the picture regarding Third Party, Assisted and self-reporting sites across the MPS 2 years ago, which needs to be refreshed.
- On-line reporting (<https://online.met.police.uk/>) in the MPS is still operational and is fit for purpose. The Home Office will access it as the national scheme (www.reportit.org) has collapsed. Commissioner Sir Paul

Stephenson and the Police Minister Vernon Cocker MP have met to discuss other forces having access through the MPS portal.

- Non-MPS reporting sites and information recording processes by their very nature do not fall under MPS control
- The review of policies and procedures under the EIA process takes into account access methods and the removal of barriers
- The MPS reporting website is available 24/7, however it may not be accessible to non-English speaking victims and victims with some communication needs
- Ownership of the infrastructure and support systems required to manage Third Party and Online reporting are managed by Directorate of Information (DOI)
- The whole subject concerning crime reporting is covered at: http://www.met.police.uk/reporting_crime/index.htm

OBJECTIVE C9

Lead: Director Human Resources

Identify inequalities experienced by personnel from across all diversity areas and promote relevant policy changes.

HR Policies and Standard Operating Procedures (SOPs) set out the processes and procedures to be followed in respect of each policy area. These are to ensure uniformity of application across the MPS and that personnel are not disadvantaged by any policy.

HR monitors and reports on policy impact on personnel based on diversity and takes remedial action to address potential disproportionality. HR Services monitors questions fed into Resources Directorate's Strategy and Improvement Department, and also monitors HR Forum questions, personal e-mails to team members and telephone calls to identify any Policy or SOP deficiencies or changes required. Fairness at Work data is also considered.

The Practice Support Team monitors the databases containing information gained from complaints, grievances and exit interviews. The Employment Tribunal Unit carries out the same function in relation to Employment Tribunals. Exit surveys are analysed by the Career Management Unit. Data is regularly analysed and reports are generated for a number of relevant stakeholders including the MPS and GLA. From data gathered, both the Practice Support Team and the Employment Tribunal Unit regularly disseminate learning through the publication of newsletters and reviews. In addition, the data captured is used to proactively identify areas of disproportionality and 'target harden' to improve organisational performance. Staff surveys are held in relation to levels of satisfaction.

Policy Developers conduct a full Policy and SOP review (that is, an Equalities Impact Assessment) every 3 years but earlier changes are also made when required. During review, internal consultation is conducted with Staff Support Associations, Trade Union and Federation Representatives, other Directorates and the HR Community. External consultation is also carried out

with other Forces or Services and non-Police organisations such as the NHS, London Fire Brigade and Government Departments.

Policies are published on the Publication Scheme, Ask HR and in Notices. Generic e-mails to HR Managers, requiring them to cascade new information to HR personnel and line managers, are regularly sent.

HR Services produces an Annual Monitoring report to the Strategy and Improvement Department on all HR Policies and SOPs, available at http://www.met.police.uk/foi/az_index.htm

Diversity Data is analysed monthly and a six-monthly report is produced for the MPA. Reports to the MPA's Communities, Equalities and People Committee can be accessed here: <http://www.mpa.gov.uk/committees/cep/> This information is also given to the MPS Diversity Board, minutes available at: http://www.met.police.uk/foi/az_index.htm

OBJECTIVE C12

Lead: Director Human Resources

Delivery of the Leadership Academy Programme

The Leadership Academy designs, develops and delivers high-quality values based open leadership programmes and bespoke products and services to meet the needs of policing locally, nationally and internationally. The Academy aims to help improve operational performance and service delivery through effective leadership capability in all ranks and grades. Leadership development for all is offered, recognising that everyone in policing has leadership responsibility, whether as a manager of people, a member of a team, interacting with the public or providing a support function.

Open Programmes

In response to the high demand for Leadership Academy programmes, 2009 will see the launch of the Open Programmes. The Open Programmes are a variety of one-day modules. All modules provide a great development opportunity for staff to enhance their leadership capability, team performance and develop skills in areas that are pertinent to effective leadership within the organisation.

The Commissioner's Leadership Programmes are available for:

Team Leaders

The role of team leader is crucial to the successful delivery of policing. The MPS is embarking on a great period of organisational change; in the way we do business, developing a citizen focus and the way we lead, based upon our values.

Leadership based on authority, hierarchy and command and control must give way to a less transactional form of collaborative leadership, which is driven by our personal and organisational core values.

This sustainable behavioural change programme follows a recognised and supported leadership pathway in modular format that provides a delegate centred experience focusing on value driven leadership and the MPS values and behaviours.

This programme is for Police Staff (Band E's and shadow bands with staff; and Band D's and shadow bands) on promotion and Police Officers on promotion to Sergeant and Inspector rank. It is formed of three modules - a total of six days. Delegates will attend all three modules as part of their development on the leadership pathway.

Portfolio Leaders

The focus of this five-day programme is to develop leadership capability through a greater understanding of values-based leadership, leading large teams, strategic perspective and influencing skills. Collectively these core components allow the delegate to establish the best opportunities to improve individual and team performance.

This programme provides delegates with a range of pertinent learning opportunities congruent with their role. This includes a Hydra based immersive exercise that requires the delegate to lead with others through an evolving scenario. Delegates receive presentations from internal and external keynote speakers, take part in group activities and form small learning groups supported by a facilitator. Opportunities exist for delegates to reflect on their current level of leadership skills and to plan future activity to improve personal effectiveness.

This programme is for both Police Staff (Band C and B, including shadow bands) and Police Officers (Chief Inspectors and Superintendent).

Command Leaders

The Command Leader Programme is a cross-organisational initiative co-ordinated by the Leadership Academy. Using the results of a performance needs analysis conducted across the MPS, the Programme has been designed to provide leadership development to all those at command leader level. The overarching theme of the Programme is rooted in the Values and behaviours of the MPS. The main objectives of the Programme are:

- To provide key skills & knowledge to enable individuals to lead and perform effectively
- To engage individuals with the Values & behaviours
- To enable them to make the Values & behaviours a practical reality for themselves and their commands

- To act as a catalyst for organisational change

The Programme is for command leaders at Chief Superintendent and Band A level and shadow bands.

Diversity Evaluation

In order to review the curriculum to ensure the equality and diversity content remains current and relevant, advice is being sought on emerging diversity issues from the relevant DCFD Diversity and Citizen Focus Advisor. In addition, the Leadership Academy is currently liaising with the Diversity Strategy and Policy Unit of the HR Learning and Development Branch to develop protocols by 30 June 2009.

To engage external stakeholders from all diversity strands in the updating, delivery and evaluation processes, consultation takes place with stakeholders, for example, through the Leadership Academy Consultative Group.

Some Leadership Academy products have been mapped with MPS staff appraisal systems and assessments of competence against National Occupational Standards. Work continues in order to link products, in partnership with the Diversity Strategy and Policy Unit by 31 August 2009.

OBJECTIVE C14

Lead: Director Human Resources

To take steps to ensure bullying and harassment in the workplace is discouraged and appropriately dealt with

The overarching Equality Policy and SOPs provide clear direction on tackling bullying and harassment. The procedures are contained within the Fairness at Work (FAW) and Mediation SOPs. The Bullying and Harassment in the Workplace SOP gives specific advice on how to deal with instances that may be unwitting or unintended. Pro-activity has been demonstrated with the development of enhanced Bullying and Harassment guidance with greater detail, accompanied by a poster campaign. Other SOP's under the Equality Policy provide advice in order that instances or the potential for bullying or harassment can be avoided.

While bullying behaviour is not tolerated, the stated Service position is that bullying and harassment should be appropriately dealt with. The MPS position toward such behaviour is robust in that it encourages proactive and remedial measures in dealing with such incidents. This is to help foster deeper understanding and improved interpersonal relationships.

Monitoring is undertaken by the Practice Support Team, which reviews organisational and local learning from completed FAW reports. Further activity will be intelligence-led from analysis of the work that the Practice

Support Team and other units undertake. Support for Line Managers and the activity that Staff Associations and Staff Support Associations conduct, play a vital role in raising awareness on bullying and harassment and contributing to an environment free from bullying and harassment.

Information relating to Fairness at Work and the related learning arising from its application, as reported to the MPA, can be found at: <http://www.mpa.gov.uk/committees/cep/2009/090312/06>

OBJECTIVE C15

Lead: Director Human Resources

To identify and meet the needs of those personnel who have caring responsibilities

The Work/Life Balance Policy and its EIA were reviewed in July 2008 (http://www.met.police.uk/foi/pdfs/policies/work_life_balance_policy.pdf). This policy includes the Carer's SOP. The day-to-day management of those who are carers is subject to local line managers. As a result MPS personnel with caring responsibilities are able to meet any obligations whilst at the same time being afforded with the opportunity to realise their full potential. The MPS attracts and retains quality applicants who have carers' needs and is seen as an employer of choice as a result. This objective is regarded as complete.

OBJECTIVE C17

Lead: Director Human Resources

To ensure independent exit interviews are carried out for all staff who leave the MPS prematurely

Independent exit interviews are conducted and the following points are relevant:

- The views of staff who leave the organisation are captured and used to improve working practices
- Confidentiality and fairness are maintained as the interviews are carried out by researchers from central HR who are independent from local managers
- Reasons are analysed across diversity strands to ensure any trends can be acted upon
- Accurate and up to date information is available regarding the reasons why people leave the organisation prematurely; this is used to drive retention and progression activities.

OBJECTIVE C18

Lead: Assistant Commissioner Territorial Policing

To produce and implement an organisational community engagement strategy

The strategy was published in December 2006 and is available at: http://www.met.police.uk/dcf/files/ce_strategy.pdf

Implementation of the strategy is being progressed through the Confidence Strategy Group Corporate Governance Work Plan.

Across all equalities strands, the Internet is used for obtaining wider information to: identify tensions in various communities and areas; complete the weekly community tension report for the Communities Together Strategic Engagement Team; identify trends; identify further community contacts; and share good practice.

The following community (internal and external to the MPS) engagement activities are also relevant:

Age

The draft MPS Youth Engagement Strategy is principally focused on the prevention of young people becoming involved in crime as victims. Engagement is one of the four strands of the MPS Youth Strategy: the other strands dealing with diversion, enforcement, and other activities addressing issues of child abuse. This strategy addresses an identified gap resulting from a review of the 'It's never too early; It's never too late' earlier strategy. Its mission is to:

- To engage and consult with young people on issues affecting them, and how police can provide an effective and accessible service (*before*)
- To engage young people in the monitoring and progress of policing activities (*during*)
- To engage young people in the evaluation of outcomes of policing activities (*after*).

The MPS is sensitive to the crowded 'Youth' landscape and has very good working relations with other key partners both at pan-London and local borough levels. The MPS is continuously evolving engagement work across all facets of service delivery in support of the single confidence measure, and the Youth Engagement Strategy will link with these as well as other plans within the Youth Strategy, such as Communication.

DCFD Age Strand activities include:

Partnerships have been developed through networking with stakeholders, both in the private and public sectors. These include Interfaith (3 faith group), Age concern, Help the Aged, London Older People's Strategic Group, UK Youth Parliament, Safer Neighbourhood, Greater London Authority, Metropolitan Police Authority, London eastconnexions, ContinYou and Local Councils.

The DCFD Age Strand Team explored the issues, concerns and views expressed by older people at the GLA Crime and Older People's event on 6 March 2009. Issues included the desire for more visible policing and for more mature officers dealing with older people. The event's results will assist in the formulation of the proposed MPS Older People's Engagement Strategy, which is due for publication by autumn 2009.

The team have worked with the Child Abuse Investigation Command (SCD5), under Project Ocean, within the area of Supplementary Schools. There are an estimated 3,000 Supplementary Schools in Britain and in excess of 600 in London. They are sometimes also known as 'complementary', 'community', or 'Saturday' schools. They operate outside of school hours and focus on cultural or religious teaching, as well as complementing education delivered in mainstream schools. Although generally they make a positive contribution to communities, they are not regulated and often have no child protection policies or safeguards, such as Criminal Record Bureau checks, in place. The SCD5 Partnership Team are aiming to assist London's Supplementary schools in developing and implementing protocols in partnership with agencies including the Department for Skills and Education and the National Resource Centre.

- The Age and LGBT strand teams work jointly with Age Concern on a project to hear and act upon the concerns of older people. A scenario-based DVD has been produced reflecting the concerns of the older LGBT community.
- The Age Strand Team assisted the Faith and Gender Strands at a Sikh engagement event, to raise awareness of police processes, particularly in reporting crime, with an appeal to this community to increase engagement with the MPS.
- Working in partnership with other agencies such as Age Positive, Greater London Forum for Older people and the London Older People's Strategy Group. This has resulted in support for the annual Capital Age Festival, and raised awareness and issues such as concerns regarding the role of PCSOs, Crime Prevention and distraction Burglary.
- The Age Strand Team are working closely with the GLA and MPA in formulating the MPS Older People's Strategy.

Some examples of MPS youth-related activities are:

- Regular monthly meetings are held with the Met Youth Advisory Group (MYAG) to engage in ways to overcome cultural barriers to youth engagement and the provision of service delivery. Members attend Gold groups to provide advice on critical incidents, have contributed to the development of MPS Stop and Search procedures and have prepared a draft youth pack to help set up local MYAGs on boroughs.
- The DCFD Age strand works in close partnership with third sector agencies that have expertise in engaging young people in activities. In partnership with the United Kingdom Youth Parliament (UKYP) the MPS supplied an engagement and promotion stall at the Youth in the City event at the Ministry of Sound.
- In support of third sector provider London eastconnexions, divergence activities relating to gun and knife crime have been established to prevent youth reoffending. Working with London eastconnexions and also with local government agencies and local Pupil Referral Units, a three-year programme has been produced to support young people into mainstream education, employment and training. A pilot is being set up in Newham borough for the first year, then in four other boroughs in years two and three. Funding has been sought from charities and the private sector. This has senior support from within MPS Territorial Policing.
- Supporting Croydon's Learning for Change Project, which raises awareness of disability, bullying and harassment amongst young people through a DVD resource and teachers' pack. This was launched on 23 September 2008, with the potential to develop it across London.

Disability

These are detailed within objectives D3 and D5 of the recent Disability Annual Report: http://www.met.police.uk/dcf/equality_stm.htm

Gender

Much ongoing gender-related engagement activity is described within the 2008 Gender Annual Report, available at:

(http://www.met.police.uk/dcf/files/ES_Gender_Report_April_08_12_font.doc).

In addition, the DCFD Gender Strand Team has developed a range of engagement strategies, including:

- Development of a Female Genital Mutilation engagement strategy with Tottenham BOCU. This has involved consultation, a conference and a workshop, which resulted in increased reporting of crime and improved trust and confidence from a hard to reach group. Local media were also used to raise the issues and highlight police services.

- Development of a so-called 'honour' based violence engagement strategy with Tottenham BOCU. This has involved the publication, on the MPS Intranet, of a Gender Reference guide, which provides clear direction, linking policy and SOPs to practical application. When approached by domestic violence survivors on Bromley BOCU, the team linked up with the local CSU to assist in developing a two-day advanced Domestic Violence training programme, driven by client needs. Working with Domestic Violence survivors, this was delivered to front-line police staff to increase confidence in local police services. Following a critical incident at Croydon BOCU, the team have worked with the MPS Violent Crime Directorate to provide a one-day workshop to better equip Community Safety Unit Staff to deal more effectively with so called 'honour' based violence and also engage with local community support groups.
- Advice and guidance is provided to the rest of the MPS via a daily helpline, the Internet and on-going consultancy support. The team engage in conferences, seminars, workshops and one-to-one coaching sessions and publish reports.
- An example of work designed to reach 'hard to hear' communities across London include joint working with The Refuge Council. This resulted in a report completed and circulated to over 300 groups across London, which provided information to a broad range of communities in relation to access to police services regarding gender violence and hate crime.
- Participation in the Capital Women's' Event in conjunction with the GLA and MPA. This provided a high-profile platform to demonstrate MPS commitment to the issues of domestic violence and honour-based. This was positively received by the GLA, MPA and those attending.
- The MPS supported an initiative to raise awareness regarding the extent of Domestic Violence across MPS, to promote MPS good practices and demonstrate partnership working. The team purchased and sold over 700 white ribbons as part of the high-profile white ribbon campaign, which was designed to raise men's awareness of Domestic Violence and attract their support. This was well received, with profits of £800 handed to the Domestic Violence charity Ashiana, who work closely with MPS on operational basis.
- Current engagement with statutory, non-statutory and Non-Governmental Organisations has allowed the MPS to focus on customer needs. Such strategic partners and examples of joint working include:
 - Foreign and Commonwealth Office and the Home Office, working on the report: *Forced Marriage, Family Cohesion and Community Engagement – National Learning through a case study of Luton*. This was launched in the House of Commons in May 2008.
 - Southall Black Sisters, jointly working on a withdrawal of public funds, which was successfully overturned because of issues arising from an EIA.

- Greater London Domestic Violence Project jointly working on a Domestic Violence faith project, raising issues on how abusing faith can lead to the control of women.
- Iranian and Kurdish Women's Organisation, on so-called honour killings
- Regular feedback is provided to MPS business groups; for example, by participating in the Commissioners Women's Focus Group, supporting Sapphire review practices in regard to managing female offenders and supporting the Violent Crime Directorate improve safety for women.
- In addition to day-to-day casework and sign posting clients, the team have worked with:
 - British Association for Women in Policing in developing the peer progression for women
 - Support Associations Meeting Up Regularly And Interacting (SAMURAI) in developing career progression for BME women
 - Police Federation representatives, in supporting staff subject to sexual discrimination).

Lesbian, Gay, Bi-sexual and Transgender

The DCFD LGBT Strand Team is Working with the TP LGBT Strategy Group on a corporate tactical response to homophobic artists performing within London Venues; corporate programmes of LGBT Liaison Officer deployment; a corporate tactical response to the management of Public Sex Environments; and the Management of LGBT critical incidents.

The team is working with the ACPO LGBT Portfolios to: implement corporate sexual orientation monitoring across all levels of service (entry, retention, progression and exit); and establish corporate and national hate crime data recording.

The team is working with HR to effect improvement to existing MPS policies in relation to Trans Staff and to establish staff association status or the equivalent for the MPS Trans Support Forum.

LGBT Business projects are timed to coincide with LGBT Calendar events, for example: LGBT History Month (February); Pride events (June – September); International Day against Homophobia (IDAHO) (May); LGBT Film Festival (March – April); World Aids Day (December); and Operation Athena dates led by TPHQ, targeting perpetrators of Domestic Violence and includes same sex perpetrators.

Directed marketing opportunities are undertaken via pink media channels. Use is made of MPS-badged promotional goods, with key messages for the reporting of Homophobic and Transphobic hate crime and the promotion of LGBT Liaison officers.

Externally community engagement work is established and ongoing with

LGBT Advisory groups, GALOP, Pride London Executive, UK BLACK Pride, Pride Outburst, Spectrum, Stonewall, LGBT Consortium, Age Concern, A Place at the Table (<http://www.aplaceatthetable.co.uk/>) and Criminal Justice partners, including the CPS.

Internally the team are working with the Gay Police Association, Commissioner's LGBT Focus Group, MPS Trans Support Forum, HR and other business groups. This includes working on Equality Impact Assessments and reviews of MPS policies and Data Monitoring; Awareness Raising Programmes on LGBT/Sexual Orientation matters; and the introduction of mentoring programmes for LGBT staff.

Using the Stonewall workplace equality index results 2009, the proposal report is under consideration for further MPS strategic engagement to improve the MPS placement for the 2010 index. The findings of the Stonewall British Gay Crime survey and the DCFD-sponsored Women's experience of Homophobia and Transphobia are being examined to implement improvements via the MPS Equalities Scheme. The latter is also being considered by the TP Pan London LGBT Strategy group and at ACPO levels.

The effectiveness of community engagement is being analysed through the use of questionnaires designed by the DCFD Performance Development and Monitoring Unit. The results will support the shaping of future programmes. As an example of monitoring, the Pride London Your Voice Counts website (<http://www.met.police.uk/events/yourviewspridelondon.htm>) has been used to gauge LGBT community views on how the MPS managed and policed the community event.

The team are working with the National Trans Police Association, taking forward Trans business matters at the strategic level and providing an access route for all Trans staff and practitioners working within police services nationally. The LGBT Strand Team lead is also a member of the LGBT Health special interest group website. This provides insight into business areas impacting on LGBT communities from a health service provision perspective and allows an overview of community feedback.

The LGBT liaison officers' databases and Special Interest Group website provides a corporate opportunity to disseminate LGBT community information and post operational information directly to key role holders. LGBT Liaison officers utilise the creation of Police GAYDAR Profiles to support operational and community matters.

The following documents are all being progressed and/or implemented:

- Stonewall Sexual Orientation Employer Handbook
- Stonewall The double glazed glass ceiling – Lesbians in the Workplace Handbook
- Stonewall Peak Performance – Gay people and Productivity Handbook
- Stonewall Workplace Equality Index (yearly benchmark)
- Terence Higgins Trust - Policing Transmission of HIV

- GALOP – Filling in the Blanks Steering Group review on Third Party/Assisted reporting.

Faith

Extensive contacts have been developed by the DCFD Religion and Belief Strand Team with public and private groups, including interfaith dialogue, for example, with the 3 Faiths Forum, World Congress of Faiths, Faith Regen, City Circle, Community Safety Trust, EHRC, Street Pastors, Woolfe Institute, St Ethelburga Centre for Peace and Reconciliation, Hindu Forum of Britain, Hindu Council, National Sikh Security Forum, Network of Sikh Organisations, National Spiritual Assembly of Bahia'is of the UK, Archbishop of Canterbury's, Interfaith Advisor, Humanist Society, Ahamadiyya Baitul Futuh Mosque, South London Interfaith, Cambridge University, Community Security Trust and the National Community Tensions Team (NCCT)

Close working relationships have been developed by the with the Faith-based staff support associations. This is in support of recruitment and retention issues, such as offering advice on faith observance in the work place and dress code issues. In addition, the team has attended and supported significant community events, such as Vaisakhi, Diwali and Eid in Trafalgar Square. The team works with officers from the Staff Support Associations to promote the MPS as an employer of choice, which has included addressing events at the House of Commons to encourage recruitment from under-represented communities.

The team provides specific information to internal departments such as Human Resources, Directorate of Professional Standards and Territorial Policing HQ, as well as outside police forces such as the Police Service of Northern Ireland and the Serious Organised Crime Agency in the following areas of Religion and Belief:

- Legislation relevant to Faith and Belief
- Guidance on Religion and Belief in the workplace
- Operation considerations when policing diverse groups
- Chaplaincy
- Death / Burial Arrangements
- Dress
- Faith Festivals
- Faith Liaison Role / Faith Projects
- Food
- Harassment and discrimination
- Interfaith
- Quiet/Prayer Rooms
- Radicalisation
- Recruitment, retention and progression
- Faith Liaison Special Interest Group
- Staff Associations
- Training
- Time off or Annual Leave for Religious Festivals

- Linking in with Partners and other contacts.

Engagement is national and local with both statutory and non-statutory groups, for example, providing reassurance, advice and support to communities when international conflicts cause concerns to UK communities.

The Internet is used to obtain wider information about possible conflicts and tensions, for example, potential conflicts in the media between LGBT communities and Christian communities.

The establishment of a Hindu Consultation Forum, following community consultation, aims to develop more effective links with the Hindu Community and work together for community safety. The partnership has been used to provide advice on a number of operational issues such as emerging tensions, demonstrations, reassurance, and exchange of information. A similar process within the Sikh communities is repeated at a National level through attending the ACPO Security Forum run by NCCT.

RACE

Relationships have been established with the internal race-based Staff Support Associations, for example, the Metropolitan Black Police Association; Metropolitan Police Chinese and South East Asian Staff Association; MPS Greek Staff Association and Metropolitan Police Ibero-American Association, to identify areas of potential work. Externally a database of key community contacts is being developed from conferences and networking. This is to complement a community engagement process, which is being developed by identifying key strategic representatives of hard-to-hear groups such as new migrant workers and Roma.

In 2008 the MPS adopted an 'Autumn Holy Festivals and Events' theme, when considering the policing of the various autumn religious festivals, rather than linking to specific faith communities. The Race Strand Team prepare and support the publication of an Autumn Festival briefing pack, which is sponsored by the Gold Commander for each event. This covers event planning, communication, community intelligence-gathering and crime prevention.

The Race Strand Team is engaged with the Football Association as a key partner in a multi-agency working group to stamp out Anti-Semitism and Islamophobia in football. This combined work highlights that racist, homophobic or any discriminatory abuse is not tolerated in sport and in particular football where Police are working with the authorities to convict and ban offenders. High profile cases such as the incidents concerning the abuse aimed at the footballer Sol Campbell by Tottenham fans in December 2008 and subsequent arrests and convictions reinforces the message that there is no place for such abuse and offenders will be banned. Additionally the work with Show Racism the Red Card includes educational activity to schoolchildren about racism in society using the attraction of professional footballers.

OBJECTIVE C19

Lead: Assistant Commissioner Territorial Policing

Consider the development of the role of Equalities Liaison Officers (ELOs), to include the roles of LGBT and Faith LOs, on each borough and within each directorate.

The role of ELOs, in terms of need and capacity, is being examined by means of a gap analysis, undertaken in partnership between DCFD and HR Organisational Development. Once the gap analysis is completed, decisions will be made on the need for such a role, a role profile and the submission of an associated business case for funding.

OBJECTIVE C20

Lead: Director Human Resources

Maintain focus on the positive action programme to address inequality in relation to:

- Recruitment*
- Retention (including those who subsequently become disabled)*
- Progression to leadership ranks and roles*
- Occupational segregation in specialist roles*

1. Recruitment and Community Engagement

The strategic drivers for a policing workforce that reflects the people and communities it serves are well rehearsed. The Commissioner and MPA have been unequivocal in stating their ambition to make the MPS an employer of choice for all Londoners, and in so doing, have endorsed both the moral and business case imperatives.

Our values highlight the key qualities that MPS personnel must demonstrate on a daily basis to meet the diverse needs of their customers. They also emphasise the fundamental need for the MPS to work in partnership with all the communities within London to develop not only solutions to social community problems, but also to act as an enabler for building community cohesion, public trust and confidence.

The Stephen Lawrence Inquiry resulted in targets for black and minority ethnic (BME) representation within the police and wider public service to ensure that a workforce that reflects the local population delivers public services.

For the MPS, this meant the BME police officer strength needed to increase

from approximately 3.5% to 26.1% (London's BME Economically Active Population (EAP)). During the intervening period, 1999 to 2008, the level of BME representation within the overall workforce has increased from 7.3% to 14.4%. In terms of police officers, during the same period, BME police officer strength has increased from 3.9% to 8.3%. Significantly, the level of BME representation amongst Police Community Support Officers (PCSOs) and Special Constables exceeds London's BME EAP.

As of 31.03.09: 8.73% of police officers are from BME communities; 30.24% and 32.59% refer to PCSOs and the MSC respectively.

Whilst our marketing and advertising approaches to recruitment are proving successful in achieving our overall BME representation targets, our progress towards 26.1% is limited by virtue of our levels of recruitment, which is predicated on growth and our organisational demographics, together with the legislation that prevails.

Our challenge is compounded still further by the significant differences in success rates between BME and white applicants, especially during the police assessment centre, where overall BME candidates are only half as likely to achieve the 60% pass mark.

Paradoxically, despite attracting BME applicants in excess of the EAP, due to the poor overall success rate for BME applicants, the number recruited falls below the BME EAP of 26%. Consequently, in order to recruit BME officers to reflect the EAP it is necessary to double the number of BME applicants within the selection process, notwithstanding the beneficial effect of our Positive Action interventions.

Recruitment Directorate will strive to achieve a workforce that is truly reflective of the diverse communities we serve through our innovative Community Engagement Strategy, together with event-based marketing and recruitment activity and tailored support sessions.

Further information relating to recruitment and engagement, as reported to the MPA, is found at: <http://www.mpa.gov.uk/committees/cep/2009/090115/08>

HR continues to work with the University of Central Lancashire on recruitment. The MetCareers team that leads on improving the candidate journey through the recruitment process has also established a method where, in addition to the generic support events, bespoke support events can be organised for communities, in particular where English may not be a first language. Recent bespoke support events included attendees from Positively Poland, Vaisakhi and the Islam Expo events.

A community engagement pilot is to be held to facilitate a working partnership with communities that will nurture trust and confidence, which in turn will lead to better access and improved recruitment. This will facilitate access to high risk/low engagement communities (i.e. Somali, Pakistani, Bangladeshi and Turkish) across four boroughs (i.e. Newham, Tower Hamlets, Haringey and

Lambeth). Pan-London work is ongoing with the Polish community and attendance at recruitment events and applications from people from this community continues to rise, following the 3 years' residency requirement being met by those who took early advantage of the 2004 accession to the EU.

There is much information and explanation on the Careers Management Unit (CMU) site, regularly updated, concerning selection and promotion processes to assist candidates. Additionally, the MPS is taking part in a review of the Integrated Competency Framework with the NPIA. The aim is to replace activities with National Occupational Standards and this will be completed nationally by December 2010.

The Recruitment Directorate holds formal pre-employment case conferences to discuss all the options around the potential reasonable adjustments to roles and accommodation. The Panels are made up of Recruitment Doctors, Recruitment Managers and representatives from Territorial Policing. Consideration is currently being given to widening the membership to include representatives from the Disabled Staff Association.

Information relating to future recruitment targets, as reported to the MPA, can be found at: <http://www.mpa.gov.uk/committees/cep/2009/090312/06>

2. Retention and Progression

Promoting Difference Programmes

The Promoting Difference Programmes have become embedded in the organisation and are expanding. The programmes are aimed at developing police officers and police staff from under-represented groups within the MPS. People who are interested in these programmes must have a commitment to developing themselves and attending for the entire duration. Applications for the programmes are particularly welcomed from those seeking promotion or selection to a specialist role.

Positive Action Leadership Programme

The Positive Action Leadership Programme (PALP) is a national initiative designed and delivered by the National Policing Improvement Agency (NPIA).

Its aim is to assist with the development of a more representative workforce by encouraging officers and police staff from under-represented groups across the six diversity strands to forge a career in the Service by applying for development and progression opportunities.

The programme addresses the following areas:

- Values, beliefs and conditioning
- Communication

- Decision making and conflict resolution
- Leadership and management
- Mentoring, coaching and networking
- Work/life balance
- The way forward

The programme is run over four days - it is important that participants are self-nominating, with support from line managers.

Promoting Difference external Mentoring Scheme

The CMU set up an external mentoring scheme pilot for Sergeants and Inspectors; they are mentored by prominent people from the business and public sector world.

In collaboration with the Safer London Foundation (SLF), HR is introducing a new mentoring scheme to help promote diversity and enhance progression for individuals from under represented groups. SLF is the independent charitable arm of the MPS and is supported by the MPS in working at the interface of the public, private and voluntary sectors in helping to make the capital a safer place to live, work and visit. SLF aims to reduce crime, promote community cohesion and develop safer neighbourhoods through innovative community led crime reduction projects, education, information and support.

The aims of the scheme are to:

- improve individual and MPS performance via setting and achieving development or work related goals
- allow individuals the opportunity to network within the community
- enhance progression and retention of those from under represented groups

The Equip to Achieve Programme

The Equip to Achieve programme was launched in May 2008. The aim is to identify talented under-represented police officers with the potential to progress quickly into senior leadership roles. The programme is open initially to minority ethnic constables, sergeants, inspectors and chief inspectors, who have been assessed as having the potential, desire and commitment to successfully join the High Potential Development Scheme (HPDS) and/or the MPS talent pool.

The programme will be run over one year, offering intensive two-day development sessions, one-to-one coaching, mentoring, feedback and learning events. A member of the HPDS or Talent Cascade will mentor each Equip to Achieve participant to enable them to develop more understanding of what it takes to be successful as a high potential officer. The programme will also be accredited, with each participant expected to complete a Certificate in Leadership Development.

Retention: Disability

The aim of the Deployment Management Framework for officers on restricted duties is to provide a more structured and non-discriminatory approach to the career management and deployment of officers on restricted duties to ensure that their skills and experience are used to the benefit of the Metropolitan Police Service and the individual.

This is a difficult area to benchmark and therefore measure success. We can very accurately measure recuperative and restricted duties but this does not necessarily relate to disability as defined by the Act.

The objective is to reduce the barriers experienced by disabled staff and the activities described within illustrate the approach being taken within recruitment to offer a wider range of opportunities for staff both to join the Organisation and to progress either laterally or through promotion.

There is clearly still much work to be undertaken on this strand and the advice and support of the Disability Staff Association will be pivotal to our efforts.

Recruitment Directorate remains entirely committed to reviewing and adapting policy and process, wherever issues are identified. In attending Organisational Learning Groups, the Directorate is able to listen to the views of staff and the Staff Associations and where ever possible to adapt and develop process to ensure DDA compliance.

OBJECTIVE C21

Lead: Assistant Commissioner Territorial Policing

To ensure that a consistent and effective level of service is provided in the area of Hate Crime.

Lessons learnt from the investigation of domestic violence have been carried across into the investigation of all Hate Crime. Relevant activities include:

- CRIS updates of 5 December 2008 have enhanced investigative processes, mandatory flagging and supervision
- A Hate Crime good investigative guide has been developed and promulgated to boroughs
- An updated Hate Crime SOP has being completed as of April 09; Investigation Guidance will be re-advertised with this publication
- Book 124D (Domestic Violence Investigation/Arrest Form) is being used on some boroughs to assist in the investigation of hate crimes (although this is not mandatory at this time)
- Good practice is highlighted on the Violent Crime Directorate CSU Team intranet site

- Training school notes and continuation training products have been reviewed and re-developed in partnership between the Violent Crime Directorate and Training Departments.
- The ongoing development of LGBT and other Liaison Officers and Hate Crime Coordinators as tactical advisors
- A MPS-wide review of all 32 BOCUs in September 2008, into public protection, serious violence and risk, resulted in each borough owning a bespoke report and action plan, with a six-monthly review. A re-inspection process will take place if considered necessary.
- The TP Violent Crime Directorate CSU Service Delivery Team maintain a resource guide relating to all Borough CSUs and publish regular updates on all aspects of CSU activity on the Intranet.
- The CSU Investigator's course delivered by the Crime Academy has been re-viewed and re-structured in consultation.
- All MPS boroughs have information sharing protocols in place with their Local Authorities in accordance with the Crime & Disorder Act 1988, which will be reviewed by the MPA Hate Crime Scrutiny Board with borough hate crime co-ordinators.
- There is a strategic performance management framework in place regarding CSU performance, for example, Performance Management Board, CCSM, Crime Managers & CSU DIs' meetings, Public Protection Score Card and MPA committees.

Examples of the capturing and sharing of best practice include:

- VCD have developed a Public Protection (including hate crime) menu of options for SNTs
- Good practice is garnered and disseminated at the 6 weekly meeting of CSU Detective Inspectors and added where appropriate to the VCD CSU Intranet site
- The Crime Control Strategy Meeting performance structure is used to disseminate good practice to Senior Management Teams and Borough Public Protection leads
- The Crime Managers' meeting is used to disseminate good practice and Areas for Improvement
- Once re-organised the MPA Hate Crime meeting will be used as a vehicle to disseminate good practice and Areas for Improvement
- In respect of public transport-related crime, the first response is investigated by TOCU or BTP. All such investigations, except where BTP have primacy, are investigated by the relevant Borough CSU.

It is an objective to reinforce the need for new and redeveloped Station Offices to take into account issues of privacy and confidentiality. The Front Counter Project, under the Territorial Policing Patrol OCU, had worked with Property Services to improve the design of front counters, including the issues of privacy and confidentiality, with the intention of running trials at three stations. However at the Property for Policing Programme Board on 10 October 2008, it was decided that the financial situation precluded any further investment in the project for the immediate future.

Code of Practice for Victims of Crime

Under the Code of Practice for Victims of Crime victims need to be updated on 'significant events' in the life of a case pre-charge, these events broadly speaking are:

- When a suspect has been arrested
- The outcome of that arrest-
 - Charge
 - Bail To Return
 - Bail to court
 - Suspect cautioned, Penalty Notices for Disorder, warning, etc.
 - Suspect No Further Action or eliminated
- Case closed undetected

The Code however also stipulates that all victims throughout the life of an investigation should receive regular updates. There may be nothing specific for the police to inform the victim of in which case this call acts as a 'Courtesy Call.' It may also prove useful to the investigation as the victim themselves may have further information and it certainly keeps the victim engaged with the criminal justice process.

Victim Focus Units, comprised of PCSOs, are in place on every BOCU to provide enhanced care during the investigative phase. They ensure victims of crime are offered appropriate referrals (e.g. to Victim Support Services), given assistance with enquiries and assist the Officer in the Case with the provision of updates. Vitally they will maintain contact with the victim at least every 28 days as required by the Code and in line with the Policing Pledge. Since the inception of the units, contact has risen from 20% of cases in April 2007 to 84% in February 2009.

At point of charge, the case is handed over to the Witness Care Unit to continue liaison. These are established in every BOCU as well on the Serious and Organised Crime Command. Their purpose is to support victims and witnesses throughout the criminal justice process, ensuring the MPS takes victims' needs into account and that information is provided quickly. As of April 2009 a pilot on Enfield, Brent and Lambeth BOCUs sees the Witness Care Officer offering volunteers within the MPS Volunteering Programme as peer supporters (aged 18-24) for young victims of crime.

It is the responsibility of the Criminal Justice Unit Manager on each BOCU to report on these on a three-monthly basis. TP Emerald's Police Performance and Witness Care and Court Interfaces Unit scrutinises these and tackles underperformance. Reports are also made to the MPA.

User Satisfaction surveys have reported a 7% increase in satisfaction in victim care since 2007.

OBJECTIVE C22

Lead: Assistant Commissioner Territorial Policing

To deliver where appropriate on external strategies, recommendations and guidance reports, including Stephen Lawrence Inquiry Report, Mayor of London's Older People Strategy; 'Staying Safe' element of the Mayor's Children and Young People's Strategy; MPA report: Disabled People and the Police - A New Relationship?; policing elements of the Greater London Authority's Disability, Race and Gender Equality Schemes and Action Plans; Disability and the Police - The Complete Works (Home Office Guidance); Diabetes UK's report 'Diabetes and the Police Officer - A Survey Report'; British Association for Women in Policing – Gender Agenda 2 Programme; HMIC/HMCPSi report 'Without Consent'; Home Office Strategy on Prostitution; Mayor's London Domestic Violence Strategy.

Under the 'Staying Safe' element of the Mayor's Children and Young People's Strategy, the following activities are taking place:

Safety on London's roads and security on public transport

The primary leads for road safety education in schools are Local Authority road safety officers. However, the Traffic OCU Partnership Unit (Traffic Management Unit and Bikesafe teams) undertakes or supports the following activities:

- The 'Safe Drive Stay Alive' annual event in Havering, which targets teenagers and includes personal presentations from victims' families and police.
- 'Risk It Lose It' is jointly managed by the Safety Camera Partnership and Traffic OCU and targets all London schools' 14 - 16 years olds through workshops, presentations and scenarios.
- 'Walk to School Week' is held three times per year and includes traffic enforcement and education in or near primary and junior schools.
- The Junior Citizen Scheme for primary school children in all London boroughs, funded via the Children Safety Education Foundation, teaches Citizenship, personal safety and life skills through scenarios and workbooks. For those unable to attend the events, DVDs are available which show a virtual event.
- Bespoke 'ScooterSafe' programme for disaffected young people to encourage them onto a legal path. This includes leadership mentoring in Camden, Hammersmith, Barkingside, Islington, Brent, Kingston and Chelsea, Ealing, Hillingdon and Westminster boroughs. The most notable is in Westminster, where local authority outreach workers source young people with a history of antisocial behaviour to sign Anti-Social Behavioural Contracts in return for free Compulsory Basic Training (CBT) after six months of good behaviour.

CO17 Transport Operational Command Unit are committed to reducing the fear of crime and ensuring the safety and security of staff and public on and around the London bus system and its interchanges with other parts of the public transport system by:

- Reducing bus related crime

- Reducing anti social behaviour
- Preventing and reducing crime against the bus infrastructure

In meeting this objective, CO17 targets all sections of the community, including young people and the elderly. This is day-to-day business, striving to improve the service to meet any identified gaps.

As part of a five-year review, we are moving towards reassurance policing, which will see an increased number of Police Officers and Transport OCU Police Community Support Officers (TPCSOs) patrolling the streets and travelling on buses.

The “Bustag” team, a team of 15 dedicated officers and staff, work with young people highlighting how anti-social behaviour impacts on others and the consequences of their actions. They are about to take possession of a bus that will be used to tour schools, etc. Amongst other activities, this will be used to show young people how we detect what activities offenders are carrying out. Analysis has not revealed any service delivery gaps in relation to young people.

Furthermore, CO17 core aims will work towards making older people feel safer when travelling on buses. Analysis shows that the elderly have the same issues as young people; therefore activity relating to young people is also relevant to the elderly.

Safety in parks and other open spaces

'Carry a knife and the consequences will follow' is the hard-hitting message of the latest MPS advertising campaign, launched on 2 September 2008 as part of ongoing activity to tackle knife crime. The campaign, targeting teenagers, includes a television ad to be shown on youth orientated television channels, a radio advert, and online websites. The campaign will support the ongoing operational activity across London.

Issues of violence and abuse towards London's children

Activities mentioned in the Mayor's Plan that are reflected within SCD5, the Child Abuse Investigation Command, terms of reference are:

- Action Point 5C.4.2 refers to legislation regarding the physical chastisement of children. This has been addressed through legislative change. Our core business ensures the law is appropriately enforced.
- Action Point 5C.4.3 refers to Child Death Review Panels. A policy that fits the needs of London's Children has been written by SCD5 in consultation with partner agencies. It is at the point of being approved and implemented through the London Safeguarding Children Board.
- Action Point 5C.4.5 refers to child trafficking and sexual exploitation. This crosses over into Operation Maxim, the MPS response to organised immigration crime. SCD5's Paladin Team, which concentrates on child trafficking, has an input into this issue. However their position is under

review, pending the lack of successful regular resource bids for additional staff.

In respect of bullying, activities have included:

- The MPS has been actively engaged with the Community Education Safety Foundation, who produce community safety handbooks for young people. At the primary age level in partnership with CESF the Junior Citizens handbook that deals with personal safety for young people aged 10-11 years has been completely revamped. In line with the handbook the MPS produced a z-card on personal safety and one of the topics is bullying.
- For the older young people CESF produce a handbook called "Street Vibe", which discusses bullying on a more adult level. Another of their handbooks "Anti-bullying" goes into bullying at a greater depth.
- The MPS has sponsored MissDorothy.com with £500K to train and distribute their citizenship material through 100K workbooks to 3000 schoolchildren on every borough. This equates to approx 12-15 primary schools per borough. Training of teachers, who are supported by Police officers and PCSOs, to deliver the material is in progress at this time. This material covers a multitude of topics around personal safety and bullying features considerably.
- Also through supporting MissDorothy.com, the Watch Over Me programme, which is aimed via DVD at all Senior Schools, covers such topics as gun crime, racism, forced marriage, drugs and bullying.

Disability Issues

The MPA report: *Disabled People and the Police - A New Relationship?; The Complete Works* (Home Office Guidance); and the Diabetes UK's report '*Diabetes and the Police Officer - A Survey Report*' were all reported upon in detail within the recent Disability Annual Report (Objectives D4, D14, and D16 respectively) at: http://www.met.police.uk/dcf/equality_stm.htm

Gender Issues

The DCFD Gender Strand works at a strategic level with the Home Office, GLA and MPA, with their Gender Equality Schemes being relevant to MPS activity within this area. In addition, the team is contributing to:

- The GLA Violence against Women strategy
- Reviewing and supporting the implementation of the Ministry of Justice's National Service Framework resulting from the Corston Report, on the treatment of women as suspects or offenders
- Implementing Gender Agenda 2, by leading Focus groups with the Specialist Crime Directorate, Firearms Unit and Havering BOCU, identifying and reporting to Senior Management Teams on key issues, for example, those of gender identity.

OBJECTIVE A3

Lead: Assistant Commissioner Territorial Policing

The MPS must improve the effectiveness of all its encounters with young people across all strands of diversity

Seen and Heard – Young People, Policing and Crime: An MPA Report, published in May 2008 contains much activity and recommendations for taking youth matters forward, some for the MPS but also for other public bodies within London. This can be accessed at:

<http://www.mpa.gov.uk/downloads/issues/youth/youth-scrutiny-adultversion.pdf>

The foreword includes the following extract:

The MPA will continue the work begun with the youth scrutiny by ensuring that further opportunities are given to London's young people to inform the Authority's work and by actively pursuing and monitoring the implementation of the reports recommendations.

In tandem with the MPA report, the draft MPS Youth Engagement Strategy, noted under objective C18, is also taking forward the young people agenda. With a programme manager recently appointed and the evidential outcomes of a strategic review of the previous strategy being considered, the governance and work of the MPS Youth Strategy will now progress in a more structured and controlled manner.

OBJECTIVE D1

Lead: Assistant Commissioner Territorial Policing

To ensure the MPS Implements the Social Model of Disability

This objective was fully reported upon within the recent Disability Annual Report: http://www.met.police.uk/dcf/equality_stm.htm

OBJECTIVE D2

Lead: Assistant Commissioner Territorial Policing

To improve the service the MPS provides in relation to mental health issues

As an update to the progress described in detail within the recent Disability Annual Report: http://www.met.police.uk/dcf/equality_stm.htm

The already established Mental Health Project Team has continued with a Superintendent and two Inspectors. They lead on a MPS wide ranging programme of work that seeks to enhance the police response to people with mental health needs. The individuals have remained in post over the last 12 months giving continuity of service.

As part of our policy of not allowing the use of police cells to persons in mental health crisis, we have continued our engagement with the NHS to have a pre-allocated medical places of safety in London for every individual who needs it. In January 2009 we carried out a scooping exercise with our Borough Mental Health Liaison Officers (BMHLO) concerning busy areas of activity. Areas of concern have been highlighted concerning delays in NHS designated places of safety. We are engaging with NHS London to ensure the service user acceptance by health staff at a place of safety is enhanced and immediate, freeing up the operational officer for mainstream police work.

We have sought to change perceptions in the MPS towards service users through the bi-annual BMHLO's conference. We encourage Borough leads to train their Borough-based officers and hold joint local service user training in place. At the Conference in November 2008 the National Association for Mental Health (MIND) presented on their campaign "Another Assault" which encourages sensitive reporting of crime by the service user. Further information can be found at: <http://www.mind.org.uk/anotherassault/>

We have enhanced the s.135 procedure (assessments on private premises) through liaison with the NHS Care Services Improvement Partnership (CSIP). A new multi-agency protocol has been endorsed by the NHS and Social Services.

We have been leading on a new national training programme for all police officers and have received funding for this through the National Policing Improvement Agency. Roll out by NPIA is due in October 2009.

We have encouraged the courts through our alignment with the Criminal Justice Board to replace fines and other punishments with Community Treatment Orders (CTOs) for mental health treatment thus ensuring the cause of mental health-related crime is treated as well as punished. This has resulted in a 71% increase in CTOs for mental health, with the aim that the service user is looked after and steered away from crime. Additionally we are supporting the London Criminal Justice Board to hold a mental health conference in October 2009 to highlight and raise awareness of mental health/criminal justice issues.

We are working with TP Emerald to ensure that their nurses report cases of mentally ill detainees to the appropriate GP or Community Mental Health Team. This is to highlight that a patient's medication or treatment regime is being reviewed, before the patient's mental health declines or crime level increases.

OBJECTIVE D7

Lead: Director Resources

Improve information on, and access to, existing and future MPS buildings, for disabled people

This objective was fully reported upon within the recent Disability Annual Report: http://www.met.police.uk/dcf/equality_stm.htm

OBJECTIVE D8

Lead: Director Public Affairs

To ensure any MPS Communication Strategies take account of the needs of disabled people.

This objective was fully reported upon within the recent Disability Annual Report: http://www.met.police.uk/dcf/equality_stm.htm

OBJECTIVE D15

Lead: Director Human Resources

Deliver the work of the MPS Health Commission, to ensure that our staff receive the support they require in relation to health issues

In addition to the information provided within the recent Disability Annual Report (http://www.met.police.uk/dcf/equality_stm.htm), the following points are relevant:

- Consideration is now being given to widen the scope of the MPS Health Commission to incorporate a more tactical rather than strategic role, encouraging debate and actions around disability issues specifically relating to posting and selection
- A new process for assessing the needs and capabilities of officers looking to become restricted, or re-assessing those that are already categorised as such, has been implemented initially at Brent OCU. An initial evaluation has shown the revised process to be effective and plans are in hand to rollout across all OCUs during 2009/10.
- Advice and guidance is always available to Staff Associations, however a more formal route is being considered. Revised Terms of Reference have been circulated for comment before a final decision is taken.

OBJECTIVE D17

Lead: Assistant Commissioner Central Operations

To give disabled people the opportunity to be involved in the MPS Emergency Planning process to ensure that the needs of disabled people are met

This objective was fully reported upon within the recent Disability Annual Report (and the previous 2007 report):

http://www.met.police.uk/dcf/equality_stm.htm

OBJECTIVE G7

Lead: Assistant Commissioner Territorial Policing

To identify and address any gender specific disadvantages faced by women as detainees, but also men and transgender men and women.

Independent Custody Visitors

Independent Custody Visitors (ICVs) are totally independent of the MPS. They have, within certain restrictions related to safety and privacy, unannounced and unsupervised access to detainees. Since the Police Reform Act 2002, they have been the statutory responsibility of the Metropolitan Police Authority (MPA).

Although the MPS has worked and continues to work to eradicate discrimination from its processes and its dealings with detainees, it is accepted that discrimination can still occur. The provision for ICVs to talk privately with detainees whilst they are still in custody is to enable them to raise any of their concerns – including if they feel that they are the subject of discrimination. It is entirely possible that an ICV visit could uncover practices that would be of concern to the MPS but that would have otherwise gone unnoticed.

ICVs receive some basic training that does contain an element of Diversity Training. They are also selected, at the recruitment stage, in part for their experience and knowledge of the subject. There are moves to increase the training, accepting that an increase in knowledge among ICVs can only help them to identify discriminatory practices. This will be of greater benefit for the MPS and those that come into its Custody Suites.

Finally, ICVs help to eliminate the *perception* that the MPS is discriminatory, especially in the Custody Suite, whether that perception is held by detainees themselves or by the community at large.

Additional Detention Issues

In addition to the information provided within the 2008 Gender Annual Report

(http://www.met.police.uk/dcf/files/7653_MPS_Gender_Annual_Report.pdf)

the following points are relevant:

- The policing elements of the Fawcett Society guide *Doing Your Duty* have been reviewed and changes are being implemented that will address concerns relevant to detainees.
- The detainee risk assessment includes new questions relating to gender specific sensitivities and to detainees with dependants, which affects women more than men, but the assessment does not preclude men.
- Work is underway on a handout to be given to all female detainees to help address concerns that they may be subject to disproportionality. This handout has met with the approval of the key members of the Department of Health's Offender Health group and The Howard League for Penal Reform.
- Towels, as opposed to large absorbent paper sheets, are being trialled at several stations for use in the showering areas with the intention of introducing them across the MPS. The Custody Directorate are also researching improvements in shower and wash facilities in our new custody buildings.
- Permanent Custody staff, and those officers who are expected to regularly perform the role of Custody Officer must have refresher training every 18 months. There is already an element of gender awareness in this training and the Custody Directorate is currently working on some additions to take further research into account.

OBJECTIVE G9

Lead: Director Human Resources

To ensure, in relation to Flexible Working (FW), that our policy and procedures are implemented fairly and effectively across all our functions and working locations.

Flexible Working is now included as a SOP under the Work/Life Balance Policy: http://www.met.police.uk/foi/pdfs/policies/work_life_balance_policy.pdf
The SOP, Flexible Working Toolkit and standard application form are all available on the Ask HR website on the intranet and on Met Forms, which is accessible for all members of the MPS

The Work/Life Balance Team offer presentations and advice on Flexible Working to Line Managers. Local Work/Life Balance Reps are also available to offer advice on all aspects of Work/Life Balance. Promotion of the Reps has been through e-mails to HR Managers for dissemination to all of their staff and posters have been produced for the Reps to place in prominent positions on their B/OCUs. Work/Life Balance Reps promote themselves locally as a source of advice.

The toolkit promotes consultation with all concerned including colleagues affected by someone's flexible working arrangement.

The Work/Life Balance Advisor monitors Flexible Working on an annual basis to ascertain levels of take-up and refusals.

The Work/Life Balance Advisor is seeking to include Work/Life Balance within the Team Leader Training.

Reviews should be completed regularly on all those working flexibly. Part of that review should be the monitoring of how the work/load, teams and the unit as a whole have been affected.

OBJECTIVE G10

Lead: Director Human Resources

To ensure that the experiences of MPS employees who take up extended breaks from service, for example, maternity leave or career breaks are positive and that the arrangements help to improve organisational performance

The Keep In Touch Scheme has recently been reviewed and is available to all line managers and individuals on the Ask HR website.

Both the Career Break SOP and the Maternity SOP include full details for line managers on how to manage an individual's return. This is available to all on the Ask HR website and both SOPs have recently been reviewed to ensure that they are fit for purpose.

The Work/Life Balance Advisor has liaised informally with the Leadership Academy and is now pursuing the process formally to include Work/Life Balance in the Team Leader Training.

Apart from the SOPs the MPS now has Work/Life Balance Representatives to advise on all Work/Life Balance issues and regular presentations are given to increase awareness of Policy and SOPs.

OBJECTIVE G11

Lead: Director Human Resources

The MPS to conduct an Equal Pay Review to ensure there is no gender inequality in respect of pay for women and men doing equal work. The review to also take account of the differing conditions that are in place for police officers and police staff.

HR Pay & Benefits carried out an equal pay review in 2003 in partnership with the trade unions which found:

- The previous pay structure had variable starting pay on appointment and progression through a band was dependent on the evaluation of an

individual's performance both of which had the potential to be discriminatory. The new structure, which has fixed starting pay and annual incremental pay progression, has reduced considerably the risk of discrimination. However, by basing assimilation on former pay, the new pay structure is likely to have imported any systemic inequality. The new structure would eliminate any problems over time as all staff who were assimilated in 2001 progress to the maximum of their pay band – a process speeded up by band shortening.

- Women were under-represented in the shadow bands offering higher pay potential.
- There were no significant differences between average basic salaries of white and visible ethnic minority staff.
- There was no evidence to suggest discrimination by gender in terms of starting salary.
- Average total pay for men was higher than women. However, this was not considered to be caused by the pay structure. Men were more likely to work in central London and receive higher location allowance, were more likely to work full-time, were more likely to work shifts and to work premium hours at the weekend. A high percentage of those working part-time, and therefore receiving pro rata pay, are women.

MPS Pay & Benefits are to carry out another equal pay review in 2008/2009 which will examine whether the conclusions of the 2003 review regarding inequalities inherited from the old pay structure being eliminated over time had proved correct.

However, the review did ask for the MPS to consider career pathways into higher paying technical and engineering disciplines so that females have more opportunity to participate. This year's review will look to see whether there have been any tangible changes on that front.

All the key elements listed will form part of the review process – the 2003 review concentrated mainly on gender so we will looking to whether core data on ethnicity and disability allows for greater scrutiny. However the review, like the one in 2003, will focus only on police staff because police officer pay is set by a completely separate negotiating process on a national basis.

OBJECTIVE RB4

Lead: Director Human Resources

The creation of a working environment where staff feel confident about sharing information regarding their religion and belief.

The MPS is committed to being an Employer of Choice, valuing staff, building trust and confidence in becoming representative of the communities we serve. In adopting an inclusive and secure approach to diversity monitoring, through the confidential self-service diversity screen we will be able to capture the workforce diversity profile and design initiatives that better deliver fairness and equality.

There are several drivers for collecting this information:

- To gain a comprehensive diversity profile and assist in building a representative workforce
- To assist in meeting our legal obligations to monitor for disproportionality in our processes
- To adopt an inclusive approach to diversity monitoring and evaluation.
- To assist in identifying areas for engagement
- To positively affect organisational culture toward inclusion and understanding
- To assist the MPS in considering and designing Positive Action strategies
- To enable ALL staff to be more confident about their personal identities.

MetHR Self Service now gives access to a confidential diversity screen, which can be accessed by all MPS personnel through 'My Diversity Data'. The confidential diversity screen has been developed to allow individuals access to a screen for self-declaring their religion and belief. Currently the sections shown are Buddhist, Christian, Hindu, Jewish, Muslim, Sikh, Other, None and Prefer Not to Say. It is currently not possible to show every religion or belief, though the MPS is using the same recommended Home Office categories as used by the Office of National Statistics. However, the number of boxes will be increased when monitoring indicates a large enough need for the expansion.

Regular Corporate News items are published on the MPS Intranet, supported by appeals from Staff Support Associations, encouraging individuals to complete the screen in complete confidence; that the information will only be used for monitoring progress and to identify areas for improvement; and that strict guidelines are in place for dissemination of that information. In this way, a clear and justifiable explanation of the reasons the MPS needs and how it can make use of such confidential information for promoting equality is provided.

As reported to Diversity Board in February 2009 (accessed under 'MPS Diversity Board' at: http://www.met.police.uk/foi/az_index.htm), of the 5625 employees who have completed the religion/ belief section of the confidential self-service screen, just over half (52.2%) are Christian and 25.7% state that they do not have a religion/ belief. 6.6% state that they are Muslim, 2.6% that they are Hindu, 1.9% that they are Sikh, 1.2% that they are Jewish and 5.1% that they have an 'Other' religion. Only 3.8% would prefer not to say. The proportion of Christians is currently lower and the proportion of those stating 'Other' or 'None' is currently higher than the general proportion of these groups in the population of London. Although a proportion of 3.8% of staff and officers preferring not to provide their religion is encouraging, it should be noted that only approximately 11% of the workforce have completed the self-service screen information to date and that the proportions might change as more people complete their information.

OBJECTIVE S5

Lead: Director Human Resources

The creation of a working environment where LGBT staff feel confident about sharing information regarding their gender or sexual orientation within the organisation.

Much of the information reported above under Objective RB4, applies equally to sexual orientation.

As reported to Diversity Board in February 2009 (accessed under 'MPS Diversity Board' at: http://www.met.police.uk/foi/az_index.htm), of the 5540 employees who have completed the sexual orientation section of the confidential self-service screen, 76.8% are heterosexual, 7.4% are gay/lesbian and 1.8% are bisexual. A further 9.2% did not state their sexual orientation and 4.7% would prefer not to say. Although a proportion of 9.2% of gay, lesbian or bisexual staff and officers is encouraging, it should be noted that only approximately 11% of the workforce have completed the self-service screen information to date and that the Gay Police Association has been actively encouraging its members to complete their information. It is therefore possible that the proportions might change as more people complete their information.

Procurement Standards (see objective C6)

1 Ethical Standards and Human Rights

- 1.1 *The Supplier shall, and shall use reasonable endeavours to ensure that its employees, agents and/or sub-contractors shall, at all times, act in a way which is compatible with the Human Rights Act 1998.*
- 1.2 *Subject to Clause 23, the Supplier agrees to indemnify and keep indemnified the MPA against all loss, costs, proceedings or damages whatsoever arising out of or in connection with any breach by the Supplier of its obligations under this Clause.*
- 1.3 *The Supplier warrants that:*
 - 1.3.1 *it does not employ, engage or otherwise use any child labour;*
 - 1.3.2 *it does not use forced labour in any form (prison, indentured, bonded or otherwise) and staff are not required to lodge deposits on starting work;*
 - 1.3.3 *it complies with all applicable environment, safety and health regulations and provides a safe and healthy workplace, presenting no immediate risks to its staff; any housing provided by the Supplier to its staff is safe for habitation; and that it provides access to clean water, food, and emergency healthcare to its staff in the event of accidents or incidents at its workplace;*
 - 1.3.4 *within the customs and practices of the countries in which the Supplier operates, the Supplier does not discriminate against any worker on any ground (including race, religion, disability or gender); and that it does not engage in or support the use of corporal punishment, mental, physical, sexual or verbal abuse and does not use cruel or unusual disciplinary practices in the workplace;*
 - 1.3.5 *it pays each employee at least the minimum wage, or the prevailing industry wage, (whichever is the higher) and provides each employee with all legally mandated benefits;*
 - 1.3.6 *it complies with the laws on working hours and employment rights in the countries in which it operates; and*
 - 1.3.7 *it has identified all the hazardous or toxic waste that it or its contractors or agents produce, and it is confident that all waste is disposed of by competent bodies via authorised disposal routes.*
- 1.4 *The MPA reserves the right at anytime to enter the Supplier's premises to monitor compliance by the Supplier of the warranties set out in this Clause 24 and the Supplier shall upon request furnish the MPA with any documents requested by the MPA in relation thereto.*

- 1.5 *The Supplier shall not discriminate directly or indirectly against any person on any grounds within the meaning of any of the following:*
- 1.5.1 *the Race Relations Act 1976 (as amended) (the “**1976 Act**”);*
 - 1.5.2 *the Race Relations (Amendment) Act 2000 (the “**2000 Act**”);*
 - 1.5.3 *the Disability Discrimination Act 1995 (the “**1995 Act**”);*
 - 1.5.4 *the Equal Pay Act 1970 (the “**1970 Act**”);*
 - 1.5.5 *the Sex Discrimination Act 1975 (the “**1975 Act**”);*
 - 1.5.6 *the Employment Equality (Sexual Orientation) Regulations 2003 (the “**Sexual Orientation 2003 Regulations**”); or*
 - 1.5.7 *the Employment Equality (Religion or Belief) Regulations 2003 (the “**Religion or Belief 2003 Regulations**”),*
- or in any other way contravene the 1976 Act, the 2000 Act, the 1995 Act, the 1970 Act, the 1975 Act, the Sexual Orientation 2003 Regulations or the Religion or Belief 2003 Regulations.*
- 1.6 *The Supplier shall notify the MPA immediately of any investigation of any proceedings against the Supplier under the 1976 Act, the 2000 Act, the 1995 Act, the 1970 Act, the 1975 Act, the Sexual Orientation 2003 Regulations or the Religion or Belief 2003 Regulations and shall keep the MPA fully informed of the progress of such investigation or proceedings.*
- 1.7 *The Supplier shall indemnify the MPA against all costs, claims, charges, demands, liabilities, damages, losses and expenses incurred or suffered by the MPA arising out of or in connection with any investigation conducted or any proceedings brought under the 1976 Act, the 2000 Act, the 1995 Act, the 1970 Act, the 1975 Act, the Sexual Orientation 2003 Regulations or the Religion or Belief 2003 Regulations due directly or indirectly to any act or omission of the Supplier, its agents, employees and/or sub-contractors.*
- 1.8 *The Supplier shall impose on any sub-contractor obligations substantially similar to those imposed on the Supplier by this Clause 24.*