

Text highlighted in blue must not be changed

EQUALITY IMPACT ASSESSMENT

The Equality Impact Assessment Standard Operating Procedure/Guidance **must** be used when completing this form:

<http://intranet.aware.mps/TP/DCF/index.htm>

Protective Marking:	Not Protectively Marked	Publication	Yes
Title:	Introduction of an Interpreters Deployment Team		
Branch / OCU:	HR Logistical Services - Specialist Deployments Desk.		
Date Created	14.06.2010	Review Date:	Version: 1.5
Author:	Chief Inspector Jon Thomson - Head of Operations		

Person completing EIA:		
Signed: Jonathan THOMSON (Chief Inspector)	Date: _____	
Person supervising EIA:		
Signed: Michael BROOKER (Director of Languages)	Date: _____	
Quality Assurance approval:		
Name: _____	Unit _____	Date _____

Decision Making	
Decision Maker:	
Name: Michael BROOKER	Rank or Grade: Director
What is the decision?	
Reject the proposal	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Implement the proposal	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Produce an alternate proposal (if so, a new impact assessment must be completed)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
SMT / (B)OCU/Management Board endorsing decision	
Name: _____	Rank or Grade: _____

1. Aims and Purpose of Proposal – see step 1 of the guidance
<http://intranet.aware.mps/TP/DCF/index.htm>

The Language programme aims to improve access to linguistic support for MPS officers and staff, enabling them to improve the quality of service on behalf of the citizens of London. The programme builds upon several key areas of activity that were already undertaken in the MPS and has key distinct elements. Whilst an overarching EIA is possible it was considered that individual EIAs for the elements would be necessary to ensure that full consideration was given to any potential for adverse impact, and where relevant highlight the positive impact on equality. This EIA covers the **interpreters deployment team IDT, (formerly known as the management service centre) the main aim of which is** to provide access to MPS interpreting services, provide efficient and effective use of MPS pool of interpreters and to provide 24/7 cover coordinated through a central call centre. The creation of the Interpreter’s Deployment Team *controls and has improved the previously ad hoc booking and calling of interpreters*, This in turn reduces both the time spent by interpreters at police stations (the increased use of Language line is part of this plan), and ensures interpreters closest to the requiring station or department are engaged first, thereby reducing travelling time and overall costs. (Expenditure on interpreters is governed by the “Agreement for the attendance of interpreters within the Criminal Justice system” This document signed initially by ACPO determines which public body takes responsibility for cost at each point in the CJ process). All staff for the call centre were recruited following extensive internal and external campaigns. All processes followed existing guidelines and adhered to current equality legislation on recruitment of staff All these corporate processes have been subject to EIAs.

The service is built on the premise that an appropriate and professional interpreting service upholds both the defendant and the victim's ECHR rights.

2. Examination of Available Information – see step 2 of the guidance
<http://intranet.aware.mps/TP/DCF/index.htm>

In order to inform the EIA the following information was used:
 Public satisfaction surveys- availability of interpreting facilities.
 Details of current usage,(nature frequency geographical location, resources time and fiscal) were used to develop a general picture of interpreter usage across the MPS
 In addition to this an interpreter user group was set up to ensure that that the interpreting community were able to raise any issues relating to current practice of using interpreters and the proposed changes
 Internal and external stakeholders were also consulted these included staff support associations, criminal justice agencies disability organisations. The results of these consultations are covered in question 5 in more detail.

3. Screening Process for relevance to Diversity and Equality issues – see step 3 of guidance <http://intranet.aware.mps/TP/DCF/index.htm>

Does this proposal have any relevance to:

a)	Age	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
b)	Disability	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
c)	Faith	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
d)	Gender	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
e)	Race	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

f)	Sexual Orientation	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
g)	Other Issues	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

4. From the answers supplied, you must decide if the proposal impacts upon diversity or equality issues. If yes, a full impact assessment is required. http://intranet.aware.mps/TP/DCF/index.htm					
Full Impact Assessment Required?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	

5. Consultation / Involvement – see step 5 of the guidance http://intranet.aware.mps/TP/DCF/index.htm					
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Who was consulted?

The key stakeholders in this programme are Territorial policing, Specialist Crime Directorate, Specialist Operations, Central Operations the Resources Directorate.

The programme team have liaised with all Borough commanders and their Senior Management Teams apprising them of the programme aims and consulting them on the importance of their diverse and separate communities. During the course of the programme users will be surveyed to assess programme impact. As the programme gathers momentum publicity campaign will be launched in order to better inform the community of the programme aims.

Wider consultation took place with external agencies representing the Institute of Linguists, the Ministry of Justice, the Crown Prosecution Service and the Law Society, as well as several agencies representing the Deaf and disabled communities.

Extensive consultation took place with the Deaf community prior to the service being developed through Acton Deaf club as evidence shows that BSL is one of the hardest languages to service across the MPS.

As stated above there was also extensive consultation with interpreters through the user group.

Regular updates will also be given to the corporate IAG.

Statistics identifying interpreter usage, and also languages requested are consistently collected and monitored and any gaps in provision will be addressed.

Travelling time to and from site visits will be reduced by the creation of 6/8 interpreting hubs, thereby providing a speedier service. All hubs meet current accessibility requirements.

Date and method of consultation

Consultation took place alongside development of the management service centre this was to ensure that any issues raised could be fed back in to the project team and therefore the design and delivery of the centre and interpreter deployment. The consultation took place through face to face interviews, focus groups, attendance at meetings and briefing sessions to organisations.

However the project team understand that it is not sufficient to remain complacent about the service so ongoing consultation is planned with groups previously consulted and a new service user group is to be set up to act to 'scrutiny panel' to ensure that the service is being continually reviewed and improved. The user group will be drawn from regular internal customers from differing business commands, representatives from our main sub contractors (Language Line), staff association members and will therefore be widely representative of the communities of London and in the event that further targeted

consultation is required then this will be undertaken.
Where are the consultation records stored?
The consultation records are held by the project team and form part of the project documentation.
Give a brief summary of the results of the consultation / involvement? How have these affected the proposal?
Throughout the consultation it was made apparent that the service needs to meet the specific needs and requirements of equality target groups and satisfy the more complex needs of providing an interpreting service that will stand the test of meeting evidential scrutiny.
6. Full Impact Assessment – see step 6 of the guidance http://intranet.aware.mps/TP/DCF/index.htm Explain the potential impact (whether intended or unintended, positive or negative) of the proposal on individuals or groups on account of:
Age Young persons Consultation took place with several key agencies representing the interests of young people and who have an understanding of the Criminal Justice Systems and how they affect vulnerable persons, such as young people. The programme is built around ensuring that young person's rights are protected throughout the interview process. Older persons No significant issues were highlighted; however callers requesting linguistic support need to be mindful of issues relating to dementia and old age as linguistic support may need to be alongside other advocacy support.
Disability The consultation indicates that BSL continues to be one of harder languages to service across the MPS. Within this element it was necessary to determine the extent of current usage of BSL across the MPS and also current BSL interpreter provision. This was to ensure that there was no risk to the MPS of failing to provide a reasonable service to the Deaf and disabled communities, and to minimise the potential for any claims under the DDA and HRA. Provision of BSL interpreting services will improve through, and with the development and use of initial contact software that will allow all staff at the Service Centre to match and allocate appropriate resources to demands for linguistic support and also to assess the risks associated with each request for the customer staff and MPS. With the increasing complexity of the Deaf community further consideration needs to be given to meeting the needs of sign language other than British sign language in these instances and where interpreters cannot be sought through the own staff linguistic skill database. In these cases advice will be sought through the Deaf Interpreters Network. However issues may arise if these 'interpreters' capability cannot meet the test of evidential scrutiny. Meeting the interpretation needs of those users with mental health issues and learning disability difficulties is also highlighted -where possible these requests will be met through the own staff skills database.

<p>Religion and Belief</p> <p>The issues associated with religion and belief were centred around possible conflicts that could occur if interpreters were perceived by either defendants or victims as belonging to particular religious groups that are at odds with their own particular beliefs. This has not been identified as a significant issue to date but provisions will exist through the use of initial contact software which will allow all staff at the Service Centre to match and allocate appropriate resources to demands for linguistic support and also to assess the risks associated with each request for the customer staff and MPS</p>
<p>Gender</p> <p>As with all cases particular sensitivities need to be understood when requesting interpreting services especially for women, men or transgender community who may be reporting hate crime. Whilst it is not the remit of interpreters to understand the complexities related with these issues, callers who request the service will need to understand these so that an appropriate interpreter can be sought, and an accurate risk assessment made for all parties. The software development plus training for Management service centre staff will help to mitigate against the potential for any adverse impact. Again requests for service will be monitored and reviewed to ensure that these issues do not go unchecked.</p>
<p>Race</p> <p>As previously stated within the sections for religion and belief and gender. The issues associated with race may centre on possible conflicts that could occur if interpreters were perceived by either defendants or victims as belonging to particular racial groups. As with all cases particular sensitivities need to be understood when requesting interpreting services for those dealing with race hate crimes. Whilst it is not the remit of interpreters to understand the complexities related with these issues, callers who request the service will need to understand these so that an appropriate interpreter can be sought and an accurate risk assessment made for all parties. The software development plus training for Management service centre staff will help to mitigate against the potential for any adverse impact. Again requests for service will be monitored and reviewed to ensure that these issues do not go unchecked.</p>
<p>Sexual Orientation as above hate crime DV</p> <p>As previously stated within the sections for religion and belief, gender and race. As with all cases particular sensitivities need to be understood when requesting interpreting services for those dealing with hate crime. Whilst it is not the remit of interpreters to understand the complexities related with these issues, callers who request the service will need to understand these so that an appropriate interpreter can be sought and an accurate risk assessment made for all parties. The software development plus training for Management service centre staff will help to mitigate against the potential for any adverse impact. Again requests for service will be monitored and reviewed to ensure that these issues do not go unchecked</p>
<p>Other issues</p>

7. Monitoring – see step 7 of the guidance http://intranet.aware.mps/TP/DCF/index.htm
a) How will the implementation of the proposal be monitored and by whom?
<p>The MPS Language Programme SMT is responsible for the direct implementation of this element of the programme. Therefore responsible for monitoring and reviewing actions arising out of this EIA on regular basis with a full update on progress provided on an annual basis</p> <p>As this is a new initiative monitoring and review of its impact on target groups has been identified as a priority within the project plan. Consultation has been ongoing with key stakeholders and any issues relating to adverse impact have been addressed by modifying the service provided. However we are not complacent and understand that the service needs to be responsive to ever changing communities of London. Further consultation is planned with community groups and stakeholders as the initiative gains momentum.</p>
b) How will the results of monitoring be used to develop this proposal and its practices?
See above
c) What is the timetable for monitoring, with dates?
See above

8. Public Availability of reports / result – see step 8 of guidance http://intranet.aware.mps/TP/DCF/index.htm <i>What are the arrangements of publishing, where and by whom?</i>
In keeping with current MPS guidance details of this EIA will be published on the intranet and internet alongside a commitment to provide a full impact assessment on request