MPS update on activity and progress

'Disabled People and the Police – a new relationship?'

1.   Theme: Custody

1.1   Recommendation 38

'That the MPS ensure that a disabled person in custody has access to their familiar personal assistance'

1.1.1   A familiar personal assistant (FPA) is someone who helps a disabled person to carry out everyday tasks such as getting up, getting around, bathing etc. A disabled person in custody who has a familiar personal assistant (FPA) is likely to need the help provided at some stage whilst they are in custody.

1.1.2   The fact that conditions within custody suites and the overarching needs of the investigation must be borne in mind when considering what reasonable adjustments can be made to allow disabled persons access to their personal assistants. Custody officers are responsible for the care and control of all detained persons and will be held to account should an untoward incident occur in what can be a frequently demanding and pressurised environment. Custody officers must be allowed to effectively supervise the custody suite within the limits imposed by law and by Service instructions.

1.1.3   For instance, it is usual for detainees to be kept separate from others. This includes categories of detainees such as children and those who are mentally vulnerable. Whilst they will have access to their "appropriate adult" at stages throughout their time in custody, this needs to be controlled by custody staff, as directed by the custody officer.

1.1.4   When they are not directly assisting the detained person, it is normal practice for the appropriate adult to wait within the public area of the police station or return when asked to do so by police. This is not intended to interfere with the detained person's right to consult with the appropriate adult at any time (PACE Code C, para.3.18) but such measures ensure that the custody officer is able to manage the custody suite.

1.1.5   Similarly, whilst a disabled person may have access to their familiar personal assistant, this is unlikely to be allowed throughout the person's detention. When the disabled person needs to get up, wash etc, the custody officer should consider allowing the familiar personal assistant access to the custody suite, to help the disabled person with this task.

1.1.6   The Custody Directorate has already met with David Morris, the Senior Policy Adviser to the Mayor of London (Disability) to implement Recommendation 42 - disabled people with learning difficulties have access to a chosen

appropriate advocate. Draft advice regarding the role of a chosen appropriate advocate has been completed.

1.1.7   This advice acknowledges that this role is very similar to that of an appropriate adult. David Morris is also providing advice on appropriate organisations to consult regarding this advice for instance, People First. Once completed, the advice will be added to the Custody Standard Operating Procedures (SOP) to ensure that detainees have access to a chosen appropriate adult / appropriate advocate wherever possible.

1.1.8   Version 3 of the Custody SOP includes guidance to Custody Officers on the role of familiar personal assistants in the following terms:

- a Familiar Personal Assistant is someone who helps a disabled person carry out everyday tasks such as getting up, using the toilet, washing, getting around, etc.
- a disabled detainee may need the help of a Familiar Personal Assistant whilst they are in police custody.
- this specific role is different from that of an appropriate adult. However, a detainee's Familiar Personal Assistant may perform both roles if appropriate.
- any action taken to secure the services of a Familiar Personal Assistant must be recorded in the detainee's custody record.
- access to the custody suite for a Familiar Personal Assistant should be allowed where reasonably possible to ensure that the dignity of the detainee is maintained.
- the decision to admit a Familiar Personal Assistant rests with the Custody Officer and should be made with reference to the detainee's specific needs, their risk assessment and the existing custody suite activity.
- a decision to refuse a Familiar Personal Assistant access to a custody suite must be recorded in the custody record along with the reasons for that decision being made. [1]

1.2   <u>Recommendation 39</u>

'A disabled person in custody has access to their drugs with the appropriate precautions being taken'

1.2.1   The National Guidance on the Safer Detention and Handling of Persons in Police Custody reinforces the instructions to police contained within the PACE Codes of Practice. It is not possible for police to allow disabled persons access to drugs beyond these parameters.

1.2.2   Research into the expansion of custody nurses is continuing as part of the concept of a permanent presence of a healthcare professional within custody suites. This has been endorsed as part of the Beacon Project.[2]

---

[1] Also see **Appendix 10** for Operation Emerald update on this recommendation
[2] For more information on The Beacon Project see **Appendix 7**

1.3 <u>Recommendation 40</u>

'Custody suites be fully accessible'

1.3.1 Much of the infrastructure within the MPS was built at a time when disability issues were not widely considered. As part of the MPA approved estate strategy, accessibility to and within current custody suites, is acknowledged as often being impossible and unachievable in building terms. Hence the MPA policy is to replace these facilities with modern compliant facilities, that also meet a raft of other requirements (e.g. Human Rights and Diversity Agenda) whilst also delivering better facilities to improve policing and justice outcomes in a value for money way (and to reflect the natural increase in detention rates after recent officer and Police Community Support Officer [PCSO] number growth). The MPA approved the first phase of these new facilities in June 2006 and more approvals have followed. These suites will be fully Disability Discrimination Act (DDA) compliant.

1.3.2 In the interim, it is not practicable to aspire to the objective for current suites. What is more there is no funding available in the MPA budgets to achieve this.

1.3.3 The current sites authorised by the MPA are as follows: Haringey, Waltham Forest, Merton, Hillingdon, Richmond & Twickenham, Greenwich and Barking and Dagenham in May 2007.

1.3.4 These will be progressed through the normal consultation stages with relevant customer groups (both internal and external) to ensure all needs are taken account of. Diversity issues will be taken account during this consultation phase and built into the designs of the new buildings.

1.3.5 The concept of using Short Term Holding Facilities within retail establishments to process offenders is also being explored with a proposed pilot within a central London department store to be commenced in December 2007. Representatives from the Diversity and Citizen Focus Directorate attend relevant project boards and user groups to ensure that all aspects of our statutory requirements are given due consideration for inclusion in the final design.

1.4 <u>Recommendation 42</u>

'*Disabled people with learning difficulties have access to a chosen appropriate advocate'*

1.4.1 There are many definitions and models of advocacy but generally, advocacy is about taking action to help people say what they want, secure their rights, represent their interests and obtain the services they need. One of the key principles of such a scheme is that it is independent from statutory organisations.

1.4.2 There are close parallels with this definition and that of an appropriate adult within the Codes of Practice (Code C, paragraphs 3.18, 11.17). The provision of a chosen appropriate advocate would therefore seem to follow these

principles and, whilst the two functions may sometimes be mutually exclusive, it would seem that on most occasions there is no difference.

1.4.3 The right of a person in police detention to speak privately with a legal representative in the absence of an appropriate adult may mean that the services of a chosen appropriate advocate would be necessary. However, it is unlikely that the advocate would be subject to legal privilege and may well be under a duty to disclose what was said during such consultations, in subsequent enquiries. One such instance could be where failure to do so would seriously prejudice or delay the investigation of a serious crime.

1.4.4 Version 3 of the Custody SOP includes guidance to Custody Officers on the role of chosen appropriate advocates:

- in this context, advocacy is about taking action to help people to say what they want, secure their rights, represent their interests and obtain the services they need.
- advocacy can assist detainees by helping them to clarify their own views and wishes;
- helping them to express those views and wishes in a way that ensures they are understood by others;
- providing them with all the options so they can make decisions and take their own action.
- the role of a Chosen Appropriate Advocate is very similar to that of an appropriate adult, and a Chosen Appropriate Advocate could generally perform both roles for the detainee.

2. Theme: Victims

2.1 Recommendation 18

'School liaison officers work in every borough to reduce harassment and hate crime of disabled people'

2.1.1 Croydon Borough Command Unity (BOCU) is leading a project involving local schools, disabled people and the local authority to produce an anti-disability bullying DVD, part funded by the DCFD. The project involves a drama competition and the best short plays will be produced as a DVD - the project is well developed with the drama competition part now complete. The DVD will be a resource available for all (B) OCUs.

2.1.2 The MPS have commissioned a new poster on diversity issues that covers all six strands of diversity which will support a holistic approach to input on hate crime in schools. Police officers will deal with any reports of Hate crime in a restorative justice framework where possible. Safer Schools officers are involved in Hate crime training and will bring in the type of information in a spoken format. The MPS is also creating a Teachers Pack to enable schools to involve police in diversity lessons in a an appropriate way.

2.1.3 Wandsworth Police have, in partnership with Wandsworth Council and the London Fire Brigade, produced a DVD that spotlights a project that they

piloted with young people from schools for the visually impaired and hard of hearing. The young people were taken through an innovative programme of safety skills training. The format will be cascaded to all boroughs as good practice.

2.2   Recommendation 19

'Record and analyse all Hate crime against disabled people and consult with local disabled people's organisations in addressing identified trends and issues'

2.2.1   This recommendation will be developed as part of the MPS Equality Scheme Objective D9.[3]

2.3   Recommendation 20

'Create a database to monitor crimes against disabled people including the outcomes'

2.3.1   The DDA came into force in December 1996. The Act was amended by the Disability Discrimination Bill 2005, which placed a duty on all public sector authorities to promote disability equality. This duty has had a significant impact on the way in which all public services are run and on improving the lives of disabled people. All public bodies including the Police are required to provide statistics on disability related issues. For police purposes the number of crimes perpetrated on or by a person suffering from a disability (within the terms of the Act) is also to be monitored.

2.3.2   On the 30 September 2005 changes were made to Crime Reporting Information System (CRIS) to enable monitoring of offences against and perpetrated by disabled people.

2.3.3   Two new fields were added to the Victim / Informant / Witness (VIW), Suspect and Accused Screens on CRIS. The fields are mandatory on adding or editing on the VIW screen if the role is Victim and Co/Public Body is not checked. The fields are mandatory on adding or editing an Accused and optional for Informants, Witnesses and Suspects.

2.3.4   If the answer to the question 'Victim considers that they have a disability?' is yes, then the 'Disability Category', which is a coded drop-down list, becomes mandatory also.

2.3.5   The question is amended to read 'Accused considers that they have a disability?' or 'Suspect considers that they have a disability?' depending on whether the user is entering / amending data on the Accused or Suspect Screen.

---

[3] **Appendix 11 -** The MPS Equality Scheme Objective D9

2.3.6   The CRIS uses a system where entries are made using a two-letter code to abbreviate Disability Categories. Entering the code will cause a drop down box to display the category, for example entering AA in the disability field will trigger the response, 'Ability to lift, carry or move everyday objects'. The system is designed to allow searches using the two letter codes, and ensures uniformity of input. This method of input and searching is used throughout the CRIS system, enabling searches to be carried out on many different subjects, from the location of the incident, the type of incident, people involved in the incident and the weapons / tools used.

2.3.7   The codes for disability are as follows.

AA   The ability to lift, carry or move everyday objects
AB   Continence
AC   Disfigurement
AD   Eyesight
AE   Hearing
AF   Learning & Understanding difficulties
AG   Manual Dexterity
AH   Memory or ability to concentrate, learn or understand
AI   Mobility
AJ   Perception of the risk of physical danger
AK   Psychiatric / Mental Disorder
AL   Psychological - Inappropriate Behaviour
AM   Physical Co-ordination
AN   Speech
AP   Serious Illness
AO   Other - Explain in Officers' Notes.

2.4   Recommendation 23

'Consult disabled people about different ways of reporting crime and developing best practice structures such as third party reporting'

2.4.1   Whilst disabled people and groups are engaged and listened to concerning the development of policy, the MPS is inconsistent in its approach as to the level and quality of engagement across Business Groups. This recommendation will be progressed as part of the 'improving the experience of victims of crime' work currently being developed between DCDF and the MPS lead for the relevant Customer Focus strand Commander Mark Simmons.

2.4.2   Discussions are underway to move the responsibility for third party reporting and the development of third party reporting from the DCFD to the TP Violent Crime Directorate. This would fit in with their overall cross Directorate responsibility for crime reporting and Community Support Units (CSUs).

2.5   Recommendation 24

'*Each MPS Borough Command Unit to establish formal consultative relationships with local disabled peoples organisations*'

2.5.1   There are two distinct bits of work within Territorial Policing (TP): generic work to enhance development of Safer Neighbourhoods Teams and engagement with individuals and disabled peoples' organisations.

2.5.2   TP Developments: The TP Diversity Board, chaired by Commander Rod Jarman, is developing a more extensive network of engagement across the six areas of diversity to enhance the quality of policing we provide. There is a strategic plan, closely aligned with the MPS Equalities Scheme, to develop the approach and to ensure its wide spread delivery. For each of the areas there is a chief superintendent who leads a delivery group and Chief Superintendent Martin Greenslade leads the group with reference to disability, supported by Superintendent Brian Bringloe who leads on issues regarding Mental Health and policing.

2.5.3   The approach is to develop identified liaison officers on each BOCU who will work on a day to day basis to both support police operations but also to enhance the quality of consultation. We already have Borough Mental Health Liaison officers (BMHLOs) on each Borough and are increasing this to each operational OCU over the next few months. The intention is to create these new roles to work alongside both the BMHLOs and other liaison officers (e.g. LGBT LO). This is at an early stage and full consultation will take place as we develop the role and approach. We are not committing to full time roles on each BOCU but the intention is to improve the focus on accessibility of services.

2.5.4   Safer Neighbourhoods developments: The ethos of Safer Neighbourhoods Teams (SNTs) is visibility, accessibility and familiarity. Our officers are continually encouraged to engage with their local communities in order to deliver a policing service that meets their needs. Our officers are trained to deliver a very specific Safer Neighbourhoods policing model. This model involves seven stages, which, collectively, identify the priorities of local people within any given neighbourhood and then ensures that these priorities are tackled effectively.

2.5.5   In researching their local communities, Safer Neighbourhoods Officers are required to find out what is already known about a particular neighbourhood. In particular, it is essential to identify any potential difficulties in engaging with local people. Therefore it is vital that officers should use all available demographic data coupled with local and community intelligence to identify the different groups/communities that exist within the neighbourhood. Boroughs are recruiting people with disabilities onto their neighbourhood panels, although it is fair to say there is more work to do.

2.5.6   The Central Safer Neighbourhood Teams have developed guidance on setting up 'Neighbourhood Panels'. This also forms part of the 5-day SN Course.

Within this guidance is discussed the role of other local community forums such as Consultative Groups and Sector Working Groups (SWGs). It is important to consider how changes will affect other consultative processes such as the Community Police Consultative Group (CPCG). On many boroughs each SWG has a seat on the CPCG. Although including a representative from each neighbourhood panel would increase numbers at the CPCG it would ensure geographic representation, improve consultation and help increase diversity on CPCGs. Neighbourhood panels are also a useful group for consultation by Crime and Disorder Partnerships and the MPS.

2.5.7   Safer Neighbourhoods Teams are also required to develop 'Key Individual Networks' (KINs). These networks are composed of individuals across the neighbourhood who have a significant insight and are well connected within the local neighbourhood. They can include, School Teachers, Faith Leaders, Shopkeepers, and Postmen/women. Key Individual Networks (KINs) should be representative of the local community and each team has a responsibility to ensure that everything is done to establish a KIN network that is fit for purpose. This includes identifying; encouraging and getting people that have a disability onto the network.

2.5.8   At the MPA Equal Opportunities Diversity Board in May 2007, Chief Superintendent Steve Bloomfield stated he would look to put in a process that measured the number of people within Neighbourhood Panels and KINs in relation to the six diversity strands. The Central Safer Neighbourhood Unit is now working with Boroughs, through the Borough Advisory Visits, to make this happen.

2.5.9   The Central Safer Neighbourhoods Unit (SNU) is working very closely with the Diversity & Citizen Focus Directorate (DCFD) to that there is a joined up approach to community engagement. This is evident through the 'Communities Together' meeting, which is also attended by an MPA member. The Central SNU and DCFD are also working closely together to provide guidance to SN Sergeants on how to set up and run a meeting to ensure that people with disabilities are able to attend.

2.5.10   In response to the Community Engagement Conference on 28 October 2006 the MPS, MPA and Safer London Foundation (SLF) are working on a Community Engagement Project that will address a number of training issues for Neighbourhood Panel Chairs. The desired outcome of this project is to improve the way that the police and all communities work together to resolve local priorities. This project will enable neighbourhood panels and other groups within the neighbourhood/borough to fully understand their roles and responsibilities and provide practical training to neighbourhood panels and other groups in order to improve their ability to effectively engage with the police and the community.

2.5.11   Local Diversity Forums on Boroughs are being set up and will include Deaf and Disabled peoples' organisations and individuals as part of the overall community membership of the Diversity Forums.

2.5.12   It is a better option for a borough to have one forum with people from all community and minority groups involved rather than have separate boards for each group. The joint forum is better able to deal with multi-discriminatory matters; issues affecting black lesbians, or disabled youth for example or access issues affecting places of worship that otherwise may not come to notice or fit into single topic forums.

2.5.13   Involvement of Deaf or Disabled people is being encouraged by the use of targeted advertising in media likely to be used by the disabled person highlighting the use of accessible meeting venues and provision of other access needs like interpreters and documents in alternative formats.

2.5.14   The DCFD have been involved in discussions with several borough lead officers on settling up Diversity Boards or increasing the participation of Deaf and Disabled people. For example, Disability Team members have been attending meetings in Wembley and Wimbledon Boroughs during the last six months.

2.6   <u>Recommendation 27</u>

'*In consultation with disabled people, develop a campaign to highlight crimes against disabled people, both in terms of the service the MPS offer to victims and to highlight the seriousness of the crimes to the perpetrators*'

2.6.1   Disability is a complex area of Hate crime, which is targeted against some of the most vulnerable members of the community. The MPS is focused on giving a prioritised level of service to these victims of hate crime and ensuring that perpetrators are brought to account*.*

2.6.2   Within the MPS the recognition and impact of disability on a victims capabilities to provide evidence and attend court is being continuously assessed. There is a designated officer within the Violent Crime Directorate (VCD) CSU Service Delivery Unit that looks solely at disability and age issues around Domestic Violence (DV), Hate and race enquiries.

2.6.3   This support has prompted queries from the disabled community via the Diversity Citizen Focus that have resulted in an ongoing Disabled murder assessment to see if trends or links can be spotted. DV incidents have been dip-sampled to assess the impact of disability within these investigations. Links are being developed through external agencies to assess intelligence re assaults and incidents within both the age and disabled arenas.

2.6.4   In addition the MPS are working with strategic partners in London Boroughs to further develop and publicise facilities to assist victims and witnesses when reporting serious and sensitive crimes in a safe and confidential environment. The VCD Service Delivery unit is also reviewing the Standard Operating Procedures for Domestic Violence to ensure disability issues are reflected within the guidance provided to front line staff.

2.6.5   The main challenge in relation to disability targeted hate crime is helping MPS staff to establish the difference between this and a crime committed against someone who also happens to have a disability.

2.6.6   There are concerns regarding the levels of attacks against people with disabilities, which still appear to be largely unreported. Recent research has shown that there is an issue regarding the flagging of these reports. There is now work in progress to address this and increase flagging levels. This will involve proposed changes to the CRIS and will addition look at additional factors such as communication, access and personal care needs. This is with a view to providing an enhanced level of service.

2.6.7   The MPS is responding to the challenge of under reporting crimes by working with partner agencies and advisory groups to improve the confidence of the community to come forward and report these crimes to police. This will help identify patterns of crime and apprehend more offenders. Further work is necessary to identify the motivations for this type of hate crime.

2.6.8   When these crimes are reported we have to ensure that individuals communication and access needs are identified and appropriately responded to. There are proposed changes to the current crime reporting system are currently being worked on and there is consultation with partners, for example the Disability Independent Advisory Group to explore alternative reporting methods.

2.6.9   Crimes of particular significance, for example neglect, are being addressed within the Mental Capacity Act 2005 whereby deliberate and cruel acts towards vulnerable people will be criminally accountable.

2.6.10   An area requiring training and understanding is the awareness of vulnerabilities versus disabilities. The MPS needs to recognise and disseminate to staff that not every person with a disability considers that they are vulnerable.

2.7   Recommendation 28

'Crimes of harassment and burglary against Disabled people to be placed as a formal local priority'

2.7.1   Crimes against Disabled people are assessed locally and centrally dependent on the circumstances and the support that is required. Actions are being taken to ensure that disabled victims are supported appropriately regardless of the type of crime involved. These issues remain a high focus and are being assessed in company with the Diversity Citizen Focus Directorate.

2.7.2   In respect of vulnerable adults, the MPS has recently set up a steering group reviewing the existing MPS Policy dealing with abuse of vulnerable adults/the elderly. Detective Chief Inspector Gerry Campbell of the Violent Crime Directorate, CSU Service Delivery Unit, chairs this group.

2.7.3　This group are looking at different aspects of abuse, including abuse within care homes and links to other areas of hate crime and domestic violence. Different forms of violence and abuse against the elderly will be clearly defined The aim is to provide a prioritised quality of service in relation to the investigation of violence against the elderly/vulnerable adult abuse, providing a consistent level of investigation on each BOCU.

2.7.4　Other areas that are also being looked at within the review include future raining in consultation with partner agencies with a view to improving communication between all agencies to enhance the level of service provided to victims and witnesses.

2.7.5　As with crimes targeted against people with disabilities the MPS is working on projects to overcome reluctance to report crimes of this nature and improving accessibility to report crime and promote use of third party sites. The MPS will be actively promoting and supporting these sites.

2.7.6　Upon completion of the action plan, revision of standard operating procedures will be made to the current Domestic Violence (DV) and Hate Crime policies as required.

2.8　Recommendation 29

'Follow up and inform disabled people who are victims of crime; especially those disabled people who communicate in different ways; always tell disabled people what is happening, even if there is no progress'

2.8.1　Recommendation 29 was fully explored in the November 2005 Oversight Meeting and is fully met by the introduction of the Codes of Practice for Victims.[4]

2.9　Recommendation 30

'Undertake proactive steps in taking seriously disabled people as victims of domestic violence'

2.9.1　Recommendation 30 was fully discussed in the November 2005 Oversight Meeting, the MPS is meeting the requirements of this recommendation. The MPS takes seriously all crimes of Domestic Violence (DV) including those perpetrated against those with disabilities who may find it difficult to report such crimes. Disability is specifically mentioned in the MPS Domestic Violence and Vulnerable Adult Abuse policies and Standard Operating Procedures. Disability is specifically included as one of the significant risk factors within the MPS DV risk assessment model. A member of the DIAG has recently been invited onto a Project Umbra work group taking this forward.[5]

---

[4] See **Appendix 4**
[5] Project Umbra - See **Appendix 12**

2.10   Recommendation 31

         *'In consultation with Disabled people develop the capacity to be able to
         implement policy and procedure for an enhanced level of response for
         vulnerable people in community'*

2.10.1   The first and most crucial point is that equality and diversity are central to the
         delivery of the Safer Neighbourhood programme. It is essential to the
         success of the programme that it offers a service to all based on the
         ethos of visibility, accessibility and familiarity.

2.10.2   SN teams are required to develop Key Individual Networks (KINs). These
         networks are composed of individuals across the neighbourhood who have a
         significant insight and are well connected within that neighbourhood.
         Examples of such individuals may include, schoolteachers, faith leaders,
         shopkeepers and postmen/women. KINs should be representative of the local
         community and each team has a responsibility to ensure that everything is
         done to establish a KIN network that is fit for purpose. At the present time
         there is no central recording of KINs with regards to the diversity strands.

2.10.3   The next step is to engage with local communities in forums where police and
         partners can listen carefully to views and concerns. It is important to note that
         these issues, preferences and priorities may not reflect the traditional volume
         crime or basket of ten British Crime Survey Crime issues. To enable the
         community engagement process, officers are often given 'Micro Beats', which
         allows individual officers to get to know the local communities within a small
         part of the neighbourhood, thereby building links and generating public
         involvement in the whole process, as well as increasing the amount of
         community intelligence being obtained.

2.10.4   In essence, local people decide what is most important to them. There are a
         number of methods used including 'environmental visual audits' (EVAs). There
         have been 12,647 meetings since April 2006 in which 188,763 people have
         attended. In addition, initiatives such as "have a say day" provide an
         opportunity for the public to drop-in and meet their local team, and partner
         agencies. Various mapping exercises are also used for people to pinpoint
         locations where they feel vulnerable or where they have observed or identified
         problems. There have been 1560 such events since April 2007.

2.11   Recommendation 33

         '*Provide named officers in each police station that disabled people can come
         to recognise and have confidence in'*

2.11.1   There are several trial schemes with regards to Recommendation 33. The
         Deaflink Scheme running in Westminster, Barnet, and Bromley provides
         specially trained officers for Deaf, deafened and hard of hearing people.
         Westminster, Barnet and Croydon also have a similar scheme with disability

liaison officers. This is a developing programme with no time frame for completion defined.

3   Theme: Training

3.1   Recommendation 4

'Officers and middle managers receive training to engage with and effectively interface with the Disabled community'

3.1.1   The Safer Neighbourhoods Teams (SNTs) – Inspectors, Sergeant, Constables and Police Community Support Officers (PCSO) - are specifically trained to operate according to a particular policing model comprising seven stages. The stages ensure that the teams have identified the priorities of local people within any given neighbourhood and then ensure that priorities are tackled effectively and fairly by the SNTs and by other partners.

3.1.2   The 7-stage model is as follows:
- research the local neighbourhood
- engage with the local community
- identify public preferences for action
- investigate and analyse public preferences
- identify priorities for action
- plan and act
- review.

3.1.3   The aims and objectives of the 5-day training course incorporate the principles of diversity and equality in respect of the six diversity strands. Although these principles act as a thread running through the whole of the course, each student receives specific information at the beginning of the course, making the issue of equality and diversity an explicit aspect of the training. Role-play is one method used to ensure that students gain the most out of the course. This course was recently reviewed to ensure that it meets the needs of the students and SN programme. The Diversity and Citizen Focus Directorate (DCFD) was part of the review and assisted the staff on the design, content and structure of the course, in terms of diversity issues.

3.1.4   The following figures relate to attendance on the course over the past three years:

- 448 officers attended during 2004
- 877 officers attended during 2005
- 1568 officers attended during 2006
- 600 officers attended during 2007 (to date).

3.1.5   The Central Safer Neighbourhoods Teams (SNTs) collate examples of the various engagement activities engaged in across the MPS in order to identify

best practice to disseminate. Tangible examples of work carried out that have made a difference are given below.

3.1.6 Cathedrals SNT in Southwark have been working with a young female who is autistic. She had been a victim of crime and would run away from people in uniform. After a lot of work and seeking advice from outside agencies she was persuaded to accompany a SNT PCSO, to a local youth club. She now regularly attends her youth club and is said to "absolutely love it". She has also made a good circle of friends thus improving her quality of life.

3.1.7 Canning Town North in Newham is currently working with people that have acute learning difficulties. As part of the 'Look Ahead' project they are delivering crime prevention advice and guidance to a number of residents in order for them to feel safer.

3.1.8 A Hammersmith & Fulham SNT has recently done a lot of work with 'Hammersmith and Fulham Action on Disability' (HAFAD). This is a centre where people can come for advice and information services for disabled people, as well as a place to come to meet friends and socialise. The SNT will normally call in every week to speak with people there.

3.1.9 The West Finchley SNT has been working closely with the Barnet Borough Self Advocacy Group for people with learning difficulties. This group aims to give people with learning disabilities and learning difficulties a voice within the community to enable them to make informed decisions in conjunction with the police and local authority that affect their quality of life. The SNT team is working closely with this group in order to improve relations and increase understanding.

3.1.10 St Peters Ward in Islington had a problem with artifice burglary and identified that many victims were elderly and partially sighted. Local research revealed that they could not read the normal crime prevention advice due to print size. One of the PCSOs created a new leaflet and arranged a meeting with their association. This has been successful in not only reducing crime but also in building links with this group. Representatives of the group were so impressed they have now volunteered to become ward panel members; one of the team picks them up and drops them off after the meetings (due to mobility difficulties).

3.1.11 Sands End SNT were made aware of a burglary victim that was acutely   deaf and according to his housing officer, a vulnerable repeat victim. The team sergeant arranged to meet the victim of this crime at his home address along with two Housing Officers, one of whom was an interpreter. The sergeant was able to obtain all the relevant issues and explain what he and his team could do for him in the future.

3.1.12 With regard to Disability Equality Training (DET), the MPS Training Management Board have given approval for 'protected learning time' for all 50,000 MPS personnel, to complete the Police Race and Diversity Learning and Development Programme (PRDLDP) Disability e-learning package. This

provides a generic introduction to Disability awareness (strand 1 of the Race & Diversity National Learning Requirement (R&D NLR)). In turn, it provides the opportunity to contextualise the learning for the individual in their specific role, (strand 2 of the R&D NLR). [6]

3.2   Recommendation 10

'That appropriate training be developed on the social model of disability for policy makers and be integrated where appropriate in existing training and development programmes'

3.2.1   The training is part of a blended approach to race and diversity learning and development. It will include as mandatory, for all MPS staff, to complete the PRDLDP Disability, e-learning package. The implementation plan is still being developed. Notwithstanding, the first tranche of training will be given to Chief Officers, OCU Commanders, Senior Investigating Officers (SIOs), Training Managers and Staff, Supervisors, Tutor Constables, Policy Owners and managers, and Family Liaison Officers.

3.2.2   Training in the completion of an Equality Impact Assessment (EIA) has begun. The day's training explains and gives context to the Social Model.

3.2.3   The Disability e-learning package, previously mentioned, provides a generic introduction to Disability awareness (strand 1 of the Race and Diversity National Learning Requirement (R&D NLR)), which then provides the opportunity to contextualise the learning for the individual in their specific role (strand 2 of the R&D NLR).

3.3   Recommendation 11

'Disability Equality Training (DET) for all staff to be delivered by expert trainers'

3.3.1   This recommendation was discussed at the November 2005 Oversight Group and a response given that due to cost implications it was not an approach that was being considered.

3.3.2. A 'one size fits all' trainer-led approach is in direct contradiction of the findings that led to the construction of the PRDLDP and the R&D NLR, in that it was identified as not being the most effective method of delivering improved performance in race and diversity (R&D). Aside from the abstraction cost to the MPS it is not feasible to fund the provision of "expert trainers" for the entire MPS in the current and foreseeable climate of diminishing resources for the police service.

---

[6] Also see **Appendix 10** for Operation Emerald update on this recommendation

3.4   Recommendation 12

         'Senior Managers to be first to receive DET'

3.4.1   The training is part of a blended approach to Race and Diversity Learning and Development Programme that will include as mandatory for all MPS staff, a requirement to complete the PRDLDP Disability, e-learning package. The first tranche of training will be given to Chief Officers, OCU Commanders, Senior Investigating Officers (SIOs) and Training Managers.

3.5   Recommendation 13

         'Disability Equality training (DET) to be custom designed to fit the roles and responsibility of the learner'

3.5.1   The Disability e-learning package provides a generic introduction to Disability awareness (strand 1 of the Race & Diversity National Learning Requirement (R&D NLR). In turn this provides the opportunity to contextualise the learning for the individual in their specific role (strand 2 of the R&D NLR).

3.6   Recommendation 14

         'The feasibility of delivering DET for all Met Police Federation leads'

3.6.1   This recommendation's requirement has been met. The Met Federation, prior to the Federation's elections at the end of 2004 did not include DET in Federation training packages. Since then, it was agreed to extend the initial training given to all Federation representatives to include provisions of the DDA and its implications. This rollout should eventually include all work place representatives for all federated ranks across London. The initial time given for this is in the region of four hours, increasing in length for those practitioners specifically dealing with disability issues. Further, enhanced training will also be given to Federation Equality Leaders throughout the country at their bi-yearly meetings.

3.7   Recommendation 15

         '*Ensure that adequate training time is devoted for every officer for every year'*

3.7.1   Training Management Board have given approval for 'protected learning time' for all MPS personnel to complete the Police Race and Diversity Learning and Development Programme (PRDLDP) Disability, e-learning package. This provides a generic introduction to Disability awareness (strand 1 of the Race & Diversity National Learning Requirement [R&D NLR]). In turn this provides the opportunity to contextualise the learning for the individual in their specific role (strand 2 of the R&D NLR).

3.8   Recommendation 32

'*Ensure training deals with expected action after an officer has wrongfully stopped or arrested a disabled person*'

3.8.1   Version 3 of the Custody Standard Operating Procedures (SOP) (paragraphs 10.18-10.24) contains instructions to Custody Officers dealing with an arrested person who has been brought to a police station and subsequently released without charge. Although these instructions are equally applicable to any person, they are particularly relevant to disabled persons. These instructions recognise that it is important that everything is done at the earliest possible opportunity to allay any sense of grievance. [7]

3.8.2   This includes a tactful expression of regret where appropriate. The Custody SOP also contains instructions regarding assistance that may be provided when a person is released from police custody (paragraphs 10.21 and 10.24). In the event that a person is released without charge, the Custody Officer must consider whether it is appropriate to offer assistance such as transport to that person's home for instance. This would be particularly relevant to some disabled persons and the Custody SOP has been amended to reflect this:
"… If the person concerned is disabled, extra consideration should be given to their particular needs."

3.8.3   The Directorate of Professional Standards (DPS) has introduced a rolling program called the Professional Standards Support Programme, which will visit every BOCU each year and deals with how to treat people and how to avoid being the subject of complaints. This programme harvests learning from all complaints and feeds them back into training and discussions. The programme was launched by the Deputy Commissioner in November 2006 and commenced in January 2007.

3.8.4   Historically, the MPS has taught staff the implications and immediate response when a person has been wrongly stopped or arrested and that includes where the person has a disability. Our programme of intervention from Civil Actions requires officers to justify their actions and evidence reasonableness and proportionality in what they do. Within this we do highlight cases where persons with a disability have been treated in a manner that may give rise to concern.[8]

3.9   Recommendation 41

'*Officers be trained how to take a disabled person into custody. Physical contact could place the disabled person at considerable risk*'

3.9.1   The MPS supplied a full update on Recommendation 41 to the Oversight Group in October 2005.

---

[7] See **Appendix 15** for Custody Standard Operating Procedures (SOP)
[8] Also see **Appendix 10** for Operation Emerald update on this recommendation

4.   Theme: Corporate Buy-In

4.1   Recommendation 1

'*The Commissioner of the MPS publicly adopt the Social Model of Disability as the policy foundation by which the MPS undertake a plan of action to address the policing concerns and needs of Disabled people*'

4.1.1   With the introduction of the MPS Equalities Scheme 2006-2010 this recommendation has been achieved.

4.1.2   The Equalities Scheme and its resulting Disability Action Plan work to embed the Social Model of disability into MPS training and approach.

4.2   Recommendation 2

'*The MPS take steps to ensure that there is no hierarchy of equalities issues. Disability, as an equality issue, must have equal status and importance*'

4.2.1   The MPS Equalities Scheme formally adopted this recommendation. In the introduction to the Disability section it states, "by developing a unified scheme we aim to avoid creating a hierarchy with regards to equality and diversity across the different strands".

4.2.2   "The Equalities Scheme builds on the progress made through our existing Race Equality Scheme (RES) and allows us to use the experience gained in its production to meet new duties. By developing an inclusive and comprehensive scheme we will review our services in a consistent way, whilst recognising the complexity of the community we serve and work alongside. We will show an equally high level of commitment to all six strands of diversity, not lessening any emphasis on achieving Race Equality, but not creating any hierarchy of difference. We acknowledge that individuals do not fit into one category of difference but may, in fact, belong to a number of strands and potentially experience multiple discrimination."

(*MPS Equalities Scheme 2006 - 2010*, page 1)

4.2.3   The activity undertaken in support of the MPS Equalities Scheme Action Plan will be the subject of statutory annual update, to be published in December 2007. Activity specifically required under the MPA Report is detailed within the different sections of this report.

4.3   Recommendation 6

'*The adopted principle of the Social Model inform all policy and practice and that all existing policies and organisational set up be reviewed within the MPS to ensure they are in conformity with this principle*'

4.3.1   This recommendation was addressed through the introduction of the Equality Impact Assessment (EIA) process, which ensures that the principles of the Social Model inform all policy and practice. This policy provides the framework

for measuring the adverse and positive impact of policing proposals on communities, both internal and external to the MPS, through a structured and transparent process. Proposals include corporate and local policies, corporate change, projects, procedures, functions, strategies, strategic decisions, pre-planned operations, policing plans and schemes.

5. **Theme: Policy**

5.1 Recommendation 3

'*Review and broaden the current Equality Impact Assessment (EIA) process to ensure that disability issues are fully addressed'*

5.1.1 The MPS Equality Impact Assessment process (the EIA Policy and Standard Operating Procedures) was reviewed and then published in December 2006. It took into account the positive promotion aspects of the Disability Discrimination Act 1995 (DDA) general duty. This process will be further reviewed in December 2007 by the DCFD, EIA Team. Additionally this forms the basis of the MPS Equality Scheme Common Objective C3. The target date is December 2009 and the Deputy Commissioner is the lead.

5.2 Recommendation 7

'*Review old policies and ensure new policies are DDA compliant, responsible staff must perform in terms of action and implementation of policies'*

5.2.1 The Equality Impact Assessment process has been incorporated into the policy development framework.

5.2.2 All corporate policy is reviewed within a three-year cycle. This programme of reviews was re-considered by a joint internal / external consultation process as part of the development of the MPS Equalities Scheme in 2006. Unfortunately, the outcome was to identify the majority of corporate policies as a priority, thereby making none a priority. A process is now underway to rationalise these results, where necessary giving weight to the legislative significance of certain areas not least Disability issues. In the interim, the original programme of reviews (based on Race Relations issues) continues and any areas of concern can be raised and reviews brought forward if appropriate, as was the case with the Security of MPS Estate policy in 2006.

5.3 Recommendation 8

'*Learn from the implementation of the Race Relations Amendment Act and 'Disabled people and the police - a new relationship' and build on this to implement the next stage of the DDA'*

5.3.1 The rationale behind this recommendation recognised the following: 'before any change can come about the MPS must have a clear view about the

strategic direction it is taking. Changes at local level are less likely to occur without central co-ordination. It also identified that the corporate lead would rest with Diversity and Citizen Focus Directorate.

5.3.2 With the publishing of the MPS Equalities Scheme and related action plans this recommendation is viewed as complete and embodied in practice.

5.4 <u>Recommendation 9</u>

'*That the MPS develop and disseminate clear strategic policy guidance from the centre to ensure there is consistency across the boroughs'*

5.4.1 This recommendation was addressed through the introduction of the Equality Impact Assessment (EIA) Policy.[9]

5.5 <u>Recommendation 22</u>

'In consultation with disabled people, develop the capacity to be able to treat disabled people as responsible adults'

5.5.1 The MPS took part in a workshop with the Disability Independent Advisory Group (DIAG) on 19 April 2007. The issues discussed included how deaf and/or disabled people were included within Neighbourhood Panels; how they receive information from SNTs; what training do SNTs get around disability; how disabled people contact their SNT; what finances are made available for meetings to be more accessible for disabled people and how the SNTs are addressing hate against disabled people.

5.5.2 Each Safer Neighbourhood Team, as part of their own individual community engagement plan, is required to identify *all* communities within the ward and to engage with them to identify their issues and concerns. The Central Safer Neighbourhoods Unit carries out Borough Supportive Visits to ensure that the teams are working in accordance with the 7-stage model and that the engagement processes locally are fit for purpose. Advice and guidance is provided to the Senior Management Lead on the Boroughs.

5.5.3 Other levels of consultation include 'Street Briefings' where the local police team will advertise in and around a small area, one or two streets, that they will be attending at a given date and time to discuss local issues. The street briefing can also include partners from the Local Authority and Councillors. A street briefing can also be used in identifying issues from communities or groups that have been identified as not previously engaging with the police. These can include a wide variety of hard to hear or reach groups, which include people with disabilities. There have been over 1,364 street briefings across the MPS since April 2006.

---

[9] **Appendix 5** The MPS Equality Impact Assessment Policy

5.5.4 Surgeries – a number of boroughs advertise locally where and when they will hold a surgery in order to discuss local issues. The places at which these surgeries are held include hospitals, schools, shopping centres and places of worship, such as mosques and Sikh temples. Boroughs also use mobile police stations and vans to get right into the heart of local communities. We find that people with disabilities are being identified and their issues raised. In consultation with disabled people the Mental Health Project Team has regularly liaised with service users and service user groups in order to listen to their views and accept feedback. A recent example of this was taking the DIAG mental health group to Hendon Training Centre to see the recruits being given the recruit lesson on mental health.

5.5.5 Additionally we have consulted them and sought their advice on a new media strategy for the MPS, which eliminates stigma towards the service user.

5.5.6 We have also revised the MPS Violent Crime Strategy issued in draft form to ensure that the Mental Health service user is not stereotyped as causing crime but viewed as being the victim of it.

5.5.7 The MPS has also issued a new Standard Operating Procedure to enhance the status of the service user and educate our Police Officers and Police Staff around the misconceptions associated with the mentally ill and educate them to treat the service user as responsible adults. Within the Safer Neighbourhoods Framework, teams are given training on how to keep communities informed and updated on progress. Communities who feel well-informed about local police are more likely to say that crime and anti-social behaviour got better, to be satisfied with local policing and to have positive views of the police.

5.5.8 Teams are given training within the 5-day Safer Neighbourhoods Course and provided with updates on emerging issues through the quarterly Sergeants meetings. Teams are encouraged to keep all communities informed of progress including people with disabilities, in a variety of formats. These include newsletters, meetings, e-mail, web sites, local newspapers, Local Authority publications and leaflets. Teams are provided with contact points within the Central Teams and the Directorate of Public Affairs on how to obtain material in order to provide information to people with hearing or sight impairments.

5.5.9 On 28 October 2006 the MPA sponsored a Community Engagement Conference, which was attended by 180 Londoners involved in borough based Community Engagement Groups and Safer Neighbourhood Panels. The purpose of the conference was to share good practice and looking for areas for improvement. The report from the Conference has made a number of recommendations, which we are now looking at in delivering effective Neighbourhood Panels and engagement across the 630 SNTs.

5.5.10 The Community Consultative Forum (CCF) which was initially established in September 2006, has consulted with members on a range of subjects and

issues including Quality Standards through which performance is measured, the First Contact Experience for members of the public calling the police and also around the way in which our operators deal with calls from members of the public with speech impediments.

5.5.11   The Forum meets regularly to discuss a range of issues and is designed to work in partnership with the communities we serve, in order to improve the way that we deliver our services to them.

5.5.12   At a practical level Traffic OCU runs a 'Bikesafe' initiative to improve the safety of motorcyclists in the capital. They have, following consultation with the Deaf community for the last two years, worked with the Deaf Bikers Clubs and run the scheme for Deaf bikers; this has been supported by the D&CFD Disability Strand.

5.6   Recommendation 26

In the process of consultation, the MPS recognise they must go to where organisations of disabled people are and be aware of access requirements and the cost of consultation. Appropriate consultation should therefore incorporate:

- *an effective and seamless liaison process in each Borough with measurable results and effective feedback.*
- *awareness that organisations of disabled people are under resourced and over worked. The commitment to consult must come from the MPS.*
- *represent the diverse communities in London. In some boroughs ethnic minorities make up nearly half the population. Disabled people are to be found these communities as well. The same can be said for Lesbian, Gay, Bisexual and Transgender disabled people. The diverse communities cannot be ignored.*
- *members of the deaf community and people with learning difficulties should be actively included, as they tend not to form part of local organisations of disabled people*
- *Feedback to the groups as to what has been done about the things agreed at previous meetings*

5.6.1   On the broader perspective, the MPS is committed to generating effective engagement with the Deaf and Disabled communities to promote reassurance and gain valuable expert advice and support.

5.6.2   Examples of MPS support include: the Deaflink Scheme that operates in three boroughs and is being extended, where the MPS meets the costs for consultation with local Deaf people, hire of venues and Language Service Professionals (LSP).

5.6.3   Extra money has been spent on the MPS Disability Independent Advisory Group to meet the cost of reasonable adjustments that enable members to attend and participate at meetings. The MPS has attended the City Lit Deaf Days over the last four years, where they have held a workshop as part of

their consultation with the Deaf community. The MPS also met the costs to enable the contribution of delegates towards the MPS Equalities Scheme.

5.6.4   The MPS does not have an identified budget line allocated towards providing the resources and support of disability organisations that it seeks advice and support from. Central and Borough Operational Command Units need to redirect budget lines, for example, from operational policing initiatives and / or seek sponsorship to help with costs relating to their positive engagement and involvement with disability organisations, such as the introduction of disability liaison officer training at Croydon and awareness training at Westminster.

5.6.5   The Central Safer Neighbourhoods Unit does not currently collate information relating to how many disabled people, deaf and hard of hearing people are engaged with SNTs. However, At the MPA Equal Opportunities Diversity Board meeting on the 24th May 2007 the Central Safer Neighbourhoods Unit agreed, complying with the Data Protection Act, to put in place a mechanism to collate such information from the 32 Boroughs in relation to Neighbourhood Panels and Key Individual Networks. This piece of work is in progress.

5.6.6   Teams are provided with updates on emerging issues through the quarterly Sergeants meetings. Teams are encouraged to keep all communities informed of progress; this includes people with disabilities, in a variety of formats. These include Newsletters, Meetings, E-Mail, Web sites, local newspapers, Local Authority Publications, leaflets. Teams are provided with contact points within the Central Teams and the DPA on how to obtain material in order to provide information to people with hearing or sight impairments.

5.6.7   The Enforcement, Prevention, Intelligence and Communication (EPIC) performance management system has been established to provide information on SN team outputs and activity. The outputs selected are those that the Home Office (National Reassurance Policing Programme) have suggested and the MPS believes are the most likely to drive improved outcomes. EPIC data allows key outputs (for example, arrests, community engagement activity and Anti Social Behaviour [ASB]) to be monitored at both ward and BCU level. This alone allows close monitoring of those BOCUs who are examples of good practice and those where more work is to be done.

5.6.8   Safer Neighbourhoods is delivered through the 7-stage model. Consultation is at the very heart of delivering safer neighbourhoods in each of the seven stages. The Central Safer Neighbourhoods Team require that each team has a ward profile that outlines the type of community engagement that has taken place and any gaps that need to be addressed. The ward profile is a living document and as such must be kept up to date in order to drive activity in the future.

5.6.9   Safer Neighbourhoods Sergeants disseminate progress on priorities in a variety of ways. Some of which include Newsletters, leaflet drops, ward based meetings, surgeries, street briefings, Borough web sites, key individual networks and whilst on patrol through face to face contact.

5.6.10   Safer Neighbourhoods Teams are provided with publicity templates that are DDA compliant and have also been given guidance on how to produce publicity materials in line with DDA requirements. The MPS has recently published an 'alternative formats' guide which has been sent to every team.

5.6.11   Material that is produced corporately now has information asking people to contact the MPS if they require the item in an alternative format or language. Teams and Borough Press Liaison Officers have been asked to do the same with anything produced locally.

5.6.12   The MPS has a translation service available to all teams. MPS DPA and SN central Team provide advice and support.

5.6.13   The Central SN unit collate examples of good practice, which are made available by publishing them internally on the SN web site.

5.6.14   An example from St Peters Ward (Islington) centred upon artifice burglaries where many victims were elderly and partially sighted. They could not read the normal crime prevention advice due to print size. One of the PCSOs created a new leaflet and arranged a meeting with their association. This has been successful in not only reducing crime but also in building links with this group. Representatives of the group they have now volunteered to become ward panel members; one of the team picks them up and drops them off after the meetings (due to walking difficulties).

5.6.15   Although materials are not produced in different formats as a matter of course, the MPS aims to ensure that staff are aware of the need to find ways to reach people from all backgrounds. This includes ensuring that teams know that they can get assistance and advice in obtaining information in a different format from the Directorate of Public Affairs Publicity Branch. As a result of this we have recorded information, normally presented in leaflet form, into an audio format. We have also copied and pasted the document and the logo onto a Word document in a large font size to reach a group of sight impaired people. Several teams have also produced work in different languages in order to engage with certain communities in their ward.

5.6.16   The final stage of the 7-stage model is to review progress. This must be done with the local Neighbourhood Panel. It is the panel that will decide if the issue has been dealt with satisfactorily and signed off accordingly. That is why the engagement work must include all sections of the community.

5.6.17   Safer Neighbourhoods are trained and encouraged to engage with all communities in order to determine the local issues that have a disproportional impact on people's perception of crime and feeling of safety. Feeding back progress to the community is done through face-to-face meetings, newsletters, leaflets, telephone, text messages and a range of other types of communications.

5.7   Recommendation 34

'*Review appropriate adults procedure. Disabled people as appropriate adults have expertise to be utilised*'

5.7.1   The Home Office is responsible for the issue and content of the Police and Criminal Evidence Act (PACE) Codes of Practice. Code C of the Codes detail the requirement for a *"juvenile, mentally disordered or otherwise mentally vulnerable"* detainee to have access to an appropriate adult. The Codes provide details of who can be an appropriate adult. Any person undertaking the role of appropriate adult must be independent of the police. The role of an appropriate adult is set out in Code C of the Codes of Practice. For instance, if present when someone is interviewed, they must be informed that they are not there solely to act as an observer and the purpose of their presence is to: 'advise the person being interviewed, observe whether the interview is being conducted properly and fairly and *facilitate communication with the person being interviewed'.*

5.7.2   In the majority of circumstances, a parent or other family member fulfils the role of appropriate adult. The Codes also provide guidance should the parent or guardian acting as an appropriate adult require assistance with hearing or speaking and recognise that good communication between the appropriate adult and the detained person is important - for instance, an estranged parent should not fulfil this role if a juvenile objects to it. The Codes of Practice emphasise that appropriate adults cannot have played any part in the investigation of the offence and police can have no direct involvement in the setting up of any scheme (similar to the volunteer schemes already in existence).

5.7.3   We recognise that, in the case of disabled persons, it may be useful for the appropriate adult to have some knowledge or understanding of the detained person's disability.

5.7.4   Appropriate adult schemes have been established across London Boroughs to provide an appropriate adult when the detainee's family member is not able to perform this role. The Local Authority or the Youth Offending Team manages these schemes at a borough level.

5.7.5   The National Appropriate Adult Network (NAAN) is the Home Office funded organisation responsible for standards in relation to appropriate adult schemes, including recruitment and training of volunteers. NAAN have explicitly stated that it is not appropriate for police forces to be directly involved with the management of schemes. Therefore, the MPS is not able to decide how appropriate adults are recruited and what organisations are involved in this process, although the Custody Directorate has developed links with NAAN to facilitate discussion.

5.7.6   The Home Office has reviewed appropriate adult provision across England and Wales. NAAN, on behalf of the Home Office, conducted a baseline study of existing provisions and produced a report that detailed recommendations

and next steps. We have also made reference to the delays in investigations caused by the unavailability of appropriate adults in our submissions to the Home Office on the current review of the Police & Criminal Evidence Act and police powers.[10] [11]

5.8   Recommendation 35

        '*Undertake a comprehensive access audit of all its police stations and consult existing access committees of disabled people to evaluate building accessibility in compliance with the DDA*'

5.8.1   The provision of DDA audits is part of a larger out sourcing contract that went live in May 2007. Recommendations stemming from audits undertaken will be either actioned immediately, or added to the forwards works programme. They are actioned as funds become available. Facilities managers in PSD also undertake audits as part of their "business as usual" work.

5.8.2   The MPA approved policy of providing in building terms, at least two "fully accessible" police stations per Borough was completed ahead of schedule summer 2006.

5.8.3   The MPA estate strategy envisages in the main the replacement of outdated stations and a new level of 'contact provision' via new buildings including Safer Neighbourhood bases.

5.8.4   "Station" and "non-station" buildings are following the same process in that all new or replacement buildings seek to be fully DDA compliant.

5.8.5   Site and person specific adaptations are carried out as issues arise. This is considered an appropriate and value for money approach that will meet individual cases, whilst also delivering, the maximum compliance.

5.8.6   Where possible Property Services consult with local MPS groups to ensure their needs are taken account. This is usually done via local building user groups.

5.8.7   For buildings where the general public have access we have proactively been seeking to establish relevant feedback from local and London wide groups.

5.8.8   A recent example of this is signage for Safer Neighbourhood sites. A set of consultants was commissioned by the Metropolitan Police Service (MPS) and the Metropolitan Police Authority (MPA) to consult with members of the Safer London Panel on the new MPS signage toolkit. This project was intended to capture the views of members of the public on:

        • the new signage – its design and usefulness
        • whether the new signage is an improvement on the old signage

---

[10] **Appendix 6** - Summary of Police and Criminal Evidence Act and Codes of Practice
[11] Also see **Appendix 10** for Operation Emerald update on this recommendation

- whether the new signage increases their understanding of the services offered at the station or office
- whether the new signage will make passers-by more aware of station location and what impact-increased visibility has on public perceptions.

5.8.9   The feedback from this fully informed decisions taken. Although the number of disabled people who responded to the survey was small it did provide a helpful model to build on.

5.9   <u>Recommendation 36</u>

'*Provide people who use police buildings with the opportunity to feedback on accessibility'*

5.9.1   Property Services have instigated an MPS wide approach via a web site called "Direct Enquiries" and a contract has been signed with this provider for at least the next 3 years. Joining this scheme was seen as a quick win. It sprang from the Disability Focus Team (DFT) of DCFD and PSD accepted this in full. Consequently the consultation was internal only.

5.9.2   This site went live in September 2006 and public response has been very positive. The web site is a national site, which allows people to look at the facilities provided for that building, so that they know what to expect when they visit. This site is not just for police stations but also for other building types where general public may visit that is, supermarkets, libraries, museums and shops. Currently the site has over 3,507,724 hits per month. Further statistics from 1 May 2006 – 30 April 2007 show the results for hits and page views of the *"search results page"'* in the category "Police" is, hits 321,826 and consequent "Page Views" of 153,317. The number of searches for *'Police'* was 3,336.

5.9.3   There are other police forces in England using the web site, so unfortunately it is not possible to break the figures down for Metropolitan Police buildings alone. In any event it can be reasonably assumed that a large percentage of them were for MPA buildings.

5.9.4   On the website we have a feedback form where comments are fed back to us so that we can deal with them and there is also a direct link to the MPS web site where a much fuller feedback mechanism exists. All of this feedback is dealt with as appropriately by the correct part of the MPS and feedback is provided to the originator.

5.10   <u>Recommendation 37</u>

'Ensure suggestions made in the access audits and feedbacks are acted upon'

5.10.1 Access audits in compliance terms, are a mainstream part of Property Services (Facilities Management) operation as "business as usual" (see

recommendation 35). Unresolved issues are reported at least quarterly to the Director of Property Services and his senior team.

5.10.2 The 2007 outsourcing arrangements ensure checks and balances are in place on these audits and they will carry out random inspections over and above "business as usual" to check on holistic service delivery on the ground. Property Services have a director level "champion" to have oversight in this area; currently the Director of Facilities is the nominated "champion".

5.10.3 Reports on any works undertaken as part of the forward works programme are regularly reported to the MPA.

5.10.4 MPS accessibility has to relate to both "service" and "buildings" as outlined in the GLAD report. Feedback is therefore encouraged via both the Borough Command Unit (BOCU), Territorial Policing (TP) and other command units (OCU) as well as direct to Property Services.

5.10.5 Recommendations 35, 36 and 37 all deal with access, The Central Command Complex (CCC) formally known as Metcall has responsibility for receiving and handling all emergency and non-emergency calls from the public, and are working towards to making these services accessible to all Londoners.

5.10.6 Textphones have been installed to improve access to Deaf and speech-impaired people, and work is on going with the Office of the Deputy Prime Minister 999/112 liaison committee to introduce a national 999/112 SMS texting service, the group includes ACPO members, Service providers such as BT and Orange, and other stake holders including the Royal National Institute for the Deaf (RNID).

5.10.7 They have worked with their own Community Consultative Forum, (which includes disabled people) to produce a DVD about the problems people with speech impairments have when contacting the Police entitled ' When the words don't come' for staff training purposes.

5.10.8 CCC have also approached 'People First' an organisation for people with learning difficulties, to discuss the needs of this section of the community. Here Property Services seek their advice on police telecommunication services.

5.11 Recommendation 43

'*Custody policy to be part of MPS Impact Assessment Scheme'*

5.11.1 The Custody Standard Operating Procedures (SOP) was equality impact assessed in 2006. Disability is one of the six strands forming the focus of the Equality Impact Assessment.

5.11.2 The MPS Policy Workbook formed part of the EIA. Version 3 of the Custody SOP was presented to the MPS Criminal Justice Strategic Committee on 8 June for formal approval prior to publication. [12]

5.12 <u>Recommendation 44</u>

'In collaboration with disabled people, the MPS review the custody policy'

5.12.1 The Custody Standard Operating Procedures (SOP) was introduced in December 2004 to take account of the decommissioning of the Instruction Manual and replaced most of Section 2 of that document. This SOP supports the MPS Custody Policy. [13]

5.12.2 Version 3 of the Custody SOP developed this year takes into account changes made necessary by the introduction of the 'National Guidance on the Safer Detention and Handling of Persons in Police Custody'. It has also taken this opportunity to improve the style and format of the document to be more accessible.

5.12.3 This version will also include changes brought about by two other recommendations from the MPA Report concerning the availability of familiar personal assistants and chosen appropriate advocates (Recommendations 38 and 42).

5.13 <u>Recommendation 45</u>

'The complaints procedure be accessible to disabled people and how to access it be made public to organisations of disabled people'

5.13.1 In April 2006 Directorate of Professional Standards (DPS) set up a fledgling reception desk created to provide a one-stop shop for DPS services. This is growing and expanding and a bid is now in for it to be equipped with minicom. We expect this to be provided when the new location for the unit within Jubilee House is commissioned later this year.

5.13.2 The reception desk currently deals with referrals from third parties such as the Independent Police Complaints Commission (IPCC) and on line complaints and so can be accessed by those with disabilities. This information has been published on the intranet and is on the DPS web pages. The IPCC have led to a large degree the expansion of reporting opportunities and have an active involvement with 'hard to reach' groups.

---

[12] Also see **Appendix 10** for Operation Emerald update on this recommendation

[13] Also see **Appendix 10** for Operation Emerald update on this recommendation

6. **Theme: Disabled people in the MPS**

A full response to recommendations 46, 47 and 48 was submitted to the MPA Oversight Group by the Human Resources Directorate on 20 September 2006. [14]

6.1 Recommendation 46

'Disabled people be part of recruitment reviews'

6.1.1 Recently members of the Disability Independent Advisory Group (DIAG) were involved in the selection of six Diversity and Citizen Focus Advisors (DCFAs) to work within the DCFD. The new advisors will work with strategic leaders to improve MPS performance in the area of diversity and equality.

6.1.2 Members of the Disability Independent Advisory Group are currently engaged in the selection process for consultants to deal with recruitment for members of their own group.

6.1.3 The use of Community Assessors in the recruitment processes for police officers and PCSOs provide the means whereby laypersons can observe and impact on the recruitment process of front line staff at the selection centres.

6.1.4 There are currently Deaf and Disabled members on the Community Assessors list and recruitment carried out throughout and across the whole community, with people from all minority groups encouraged to apply.

6.2 Recommendation 47

'Recruitment barrier review panels be configured to ensure disabled people are involved in the decision making process of progression and career structures for staff'

6.2.1 In relation to promotion and progression, the MPS has a have a Promotion Selection Group that acts as overseers. A member of that group is from the DCFD. Additionally MPS HR meet on a regular basis with staff from the Disabled Staff Association and deal directly with them as issues arise.

6.3 Recommendation 48

'Review career paths and development opportunities for the disabled staff to create meaningful promotion opportunities'

6.3.1 This recommendation was not taken forward. The MPS ensures that promotion opportunities are available for disabled staff through reasonable adjustments being made.

6.3.2 The above view were given to the October, 2006 Disability Overview Group.

---

[14] For HR update see **Appendix 9**

6.3.3 The DSA are dissatisfied with the MPS response. Dialogue will continue between HR, DCDF, the DSA and other stakeholders to ensure that career and promotional opportunities for disabled staff remains under review.

7. Theme: Procurement Services

7.1 Recommendation 16

'MPS Procurement Services review the organisation's supplier pool and take proactive steps to market the MPS' purchasing needs to disabled peoples' organisations and businesses'

7.1.1 See Update below at Recommendation 17.

7.2 Recommendation 17

'*That Procurement Services review its purchasing procedures to ensure they are fair and not disabling and take proactive steps to encourage and support participation of disabled people's organisations in meeting the purchasing needs of the MPS'*

7.2.1 MPS Procurement Policy and the supporting Standard Operating Procedures (SOPs) aim to set clear guidelines for the procurement of all goods, supplies and services, including the disposal of property and land on behalf of the MPA (Metropolitan Police Authority).

7.2.2 This policy was written to ensure that appropriate steps are taken to deliver best value in the procurement process, in line with the MPS diversity and equality policies at all times. The updated Contract Regulations promote good procurement practice and supply chain management, public accountability, solid audit trails, and compliance with the Disability Discrimination Act 2005, European Community (EC) public procurement rules and best environmental practice.

7.2.3 The Greater London Authority (GLA) diversity questionnaire continues to be incorporated into our ITT (Invitation to Tender) pack to suppliers and from the data received we can provide the following monitoring information, on a quarterly basis, regarding corporate spend with: SMEs (Small/Medium Enterprise – Department of Trade and Industry (DTI) and Euro definition declares an SME to be under 250 employees or turnover less than 50 million Euros); breakdown of workforce in the organisation; percentage of the workforce who are Disabled, Black Asian Minority Ethnic (BAME), Lesbian Gay Bisexual Transgender (LGBT) and Percentage of staff living in London.

7.2.4 The results of this exercise for the year 2006 are as follows:

- 37 responses received on 14 procurements
- 83% of tenderers returned a monitoring form

- 56% of respondents could be classified as SMEs based on number of employees
- 1 company identifies itself as a BAME
- 1 procurement was under £49,999 in total value
- 6 procurements were between £50k - £153k
- 7 procurements were over £153,379.

7.2.5 A wide range of different sized procurements was, therefore, covered in this period, the scope of information received on specific questions, however, has been inconsistent.

7.2.6 The majority of bidders responded to the following questions:

"What is the percentage of BAME staff in your company workforce?"
28 out of 37 companies responded with the average answer given by respondents - 20%
"What is the percentage of women staff in your company workforce?"
34 out of 37 companies responded with the average answer given by respondents - 41%
"What percentage of your workforce lives in London?"
31 out of 37 companies responded with the average answer given by respondents - 35%
"*Does your organisation have a diversity policy?"*
31 organisations said that they had

7.2.7 In addition, a smaller number responded to:

"What is the percentage of disabled staff in your company workforce?"
9 responses of zero or no information.

7.2.8 Seven companies provided information in response to what percentage of LGBT staff there were in their company / workforce.

7.2.9 Information on the degree and make-up with regard to diversity ratings of the ownership/senior management of the organisation continues to be poor. The main reason given is that the organisation does not track this information.

7.2.10 As part of the overall award criteria / scoring of tender returns we are looking at the possibility of applying an appropriate scoring methodology. It should, however, be noted that the new version of the MPA contract regulations states that award criteria must <u>not</u> include 'non-commercial considerations'. Specifically, Para 10.5 states that "*Award Criteria* must not include: 'matters that discriminate against suppliers from the *European Economic Area* or signatories to the *Government Procurement Agreement.*' [15]

7.2.11 We are unable to make the return of the questionnaire compulsory (that is, reject the tender if the questionnaire has not been completed). To do so would

---

[15] MPA Contract Regulations

be in breach of EU procurement legislation, (as not appropriate in determining the most economically advantageous, or lowest cost supplier).

7.2.12 In addition, we are looking at simplifying the questionnaire itself, in conjunction with the GLA, as there is a belief that part of the reason for the poor return is the complexity of the questions being asked and that many organisations simply do not have the information to complete the questionnaire in its current form.

7.2.13 Six contracts have been awarded since tracking GLA equality / diversity information as part of the tender process. Of these, three have been awarded to SMEs. In keeping with EU rules, all contracts have been awarded on the basis of the most economically advantageous tender and, therefore, the relevant SMEs have won as a result of being the most appropriate company.

7.2.14 MPS Procurement Services (PS) is currently investigating how to record the above diversity and environmental information within the MPS MetFIN (finance) System as part of the supplier set-up process.

7.2.15 Regular meetings of the departmental SOPs forum take place and a number of amendments to the Procurement Process Policy and SOPs will be made in the coming months through the appropriate channels.

7.2.16 Recently we have moved forward in that we are actively pursuing with the GLA the possibility of an outside organization providing this type of diversity information, based on our master-vendor list. This will clearly increase the data available and the accuracy of such data. We expect to reach a decision as to the most appropriate way forward by the end of 2007.

7.2.17 A number of initiatives are in progress in Procurement Services that will have a significant impact on current procurement policies. As part of any such initiatives, appropriate changes to policies, processes and SOPs will be carried out. Procurement Services will be revising, as necessary, any standard terms and conditions for procurement to include information about the Disability Discrimination Act 2005.

7.2.18 Procurement Services are unable to accurately state how many disabled organisations we have on our supplier database due to the lack of responses we have so far received from our current suppliers. We will be looking at revising our diversity questionnaire to specifically ask organisations if they are owned and/or managed by disabled people. (However as reported above, a number of organisations do not report or monitor this information).

7.2.19 Procurement Services will ensure that the impact of disability is always considered in the specification, selection and award criteria and the contract conditions in a way, which is consistent with European Union and UK procurement rules. Training for staff involved in procurement work so that they understand the provisions of the Disability Act and the relevance of the Disability Equality Duty to their area of work is targeted for our next department branch meeting.

7.2.20   The MPS Procurement Services are in the process of arranging meetings with Disability forums and groups, such as the Employers Forum on Disability, to ensure that procedures and policies are non-discriminatory towards people with disabilities. There are no identified areas where this policy negatively impacts on disability relations.

8.   Theme: Miscellaneous

8.1   Recommendation 5

'Play a mediating role on behalf of disabled people between the various agencies involved in the Criminal Justice System'

8.1.1   This recommendation has been met. A full response from Operation Emerald was made to the MPA on 20 September 2006. [16] A summary of the Codes of Practice for Victims of Crime is attached at **Appendix 4.** [17]

8.2   Recommendation 21

'Voice recognition systems are made available for visually impaired people'

8.2.1   This equipment is available for any MPS staff who requires it. However, it is not currently available for use for members of the public, due to technical (that require the software to learn from the specific user) and user training issues.

8.3   Recommendation 25

'MPA scutinise and monitor through its committee processes the established formal consultation processes using performance indicators and MPA link member role'

8.3.1   This recommendation is the responsibility of the MPA and not the MPS**.**

---

[16] **Appendix 10** - Copy of Emerald Update
[17] Full details of the Codes of Practice for Victims can be found on the Home Office Web Page http://www.homeoffice.gov.uk/ . An abridged version is at **Appendix 4**