

METROPOLITAN POLICE AUTHORITY (MPA)

REPORT OF EQUALITIES CONSULTATION WORKSHOP
TUESDAY 23 MARCH 2004

Ionann Management Consultants Limited

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1. INTRODUCTION

The Metropolitan Police Authority (MPA) consultation workshop, which took place on 23 March 2004, was attended by about 25 representatives of from a range of local and voluntary organisations working on different aspects of diversity. A list of participants is attached as Appendix A.

The purpose of the day was to consult local communities at an early stage on two topics:

- The MPA Equality Standard and a set of draft equalities policies
- The MPA process for conducting equality impact assessments, illustrated by a sample set of policies which had already been impact assessed

Participants worked in small syndicate groups, discussing a series of questions on each of these topics, followed by report back to and discussion in the full session. A workshop pack containing the draft equalities policies, the equality impact assessment process and a sample of policies which had already been assessed, was distributed to participants in advance.

The workshop was attended by Kirsten Hearn, the MPA member responsible for the Local Government Equality Standard, Cecile Wright, MPA member and Chair of the Equal Opportunities and Diversity Board, Catherine Crawford, MPA Chief Executive, and Julia Smith, Head of the MPA race and diversity unit. Nigel Adams from the Policy Clearing House at the Metropolitan Police Service (MPS), which is undertaking a similar impact assessment process of MPS policies, also attended the event, which was facilitated by Dianna Yach and Anne Dunn from Ionann Management Consultants Limited.

Catherine Crawford and Julia Smith welcomed participants and stressed the extent to which they valued the contributions and time given by participants to assist the MPA with this work. The MPA was committed to meeting its responsibilities under the Race Relations (Amendment) Act 2000, and also wished to progress to Level 3 of the Local Government Equality Standard. Community consultation and engagement was at the heart of this commitment.

Kirsten Hearn also emphasised the MPA commitment to early consultation with London's many diverse and overlapping communities. She outlined the role of the MPA in holding the MPS accountable for the way in which it used its budget.

2. REVIEW AND ASSESSMENT OF MPA EQUALITIES POLICIES

Dianna Yach introduced the first syndicate exercise by giving a brief overview of the Local Government Equality Standard provisions. Participants then worked in small groups answering a set of questions related to the draft policies. The key points made in this session are set out below.

- *One diversity policy?*

The main topic of discussion under this question was whether there should be separate policies covering each aspect of diversity, or one over-arching diversity policy which was an umbrella for a set of separate, shorter statements on race, gender, disability, sexual orientation, religion and belief and age.

On the one hand, there was a risk that one strand of diversity might get 'lost' if it was part of a wider diversity strategy; on the other hand, although the RR(A)A 2000 meant that race was the only strand where there was a statutory duty to conduct impact assessments, a similar approach would be beneficial for the other strands as well. In addition people were complex and might often be covered by several of the main diversity areas. It was important, however, to remember the history and context of policing, race and community relations and to acknowledge the particular problems that had helped to bring about the reform of the Race Relations legislation.

There was general agreement that a broad diversity policy and a set of specific, focussed policies on each strand of diversity was the best approach, so long as this did not mean any area having a lesser status than another and that the specific policies took account of specific needs and historical context of each of the strands. Each diversity area needed its own action plans, targets and monitoring and review arrangements which were tailor made to current priorities and circumstances.

If this approach was taken, it was important to clarify and be consistent about terminology (for example, equality, diversity, race and diversity) in all the statements in order to reflect this approach.

- *Delivery of policy intentions*

While the draft policies were felt to be a good starting point, delivery and implementation of policy was the key to making an impact on staff and

communities. There needed to be performance measurements and targets and timescales attached to each policy. Similarly each policy needed to include arrangements for monitoring and review.

It was important that communities were made aware of what the MPA was doing; if they were aware of the policies, they would generally have a positive impact. More marketing was needed together with making the policies more clear and accessible, more 'user friendly'. The draft policies were thought to be too long and detailed in their present format to be easily absorbed by an external audience.

However the real impact of policing was the result of MPS rather than MPA activities. The role for the MPA was to oversee and monitor what was taking place at street level which was why these policies were important.

There were three key areas for the MPA:

- to ensure equality and diversity in its own activities as an employer
- a small service delivery function, for example, in servicing Police Community Consultative Groups, and independent visitors to police stations
- as a scrutiniser or tone-setter for the operational work of the MPS.

How best could the MPA fulfil its role of oversight at local level? At the same time, how could the MPA promote its work on diversity without also raising unrealistic expectations about what it could deliver?

- *Other comments included:*
 - The Disability policy was out of date
 - The policy on women should be a policy on gender covering wider gender issues (although some participants also felt it made a very strong and positive statement about women)
 - The MPA should consider setting up an Independent Advisory Group to assist in the consultation process.
 - Clearer definitions were needed of what constituted a policy (it was clarified later that the MPA takes a broad view of policy as recommended by the CRE – see below under impact assessment.)

- A clearer definition of the black and minority ethnic communities was also needed.

The point was also made that in order for these policies to be delivered effectively, MPA members would need training to ensure they understood their individual responsibilities and what was required of them.

3. MPA RACE EQUALITY IMPACT ASSESSMENT PROCESS

The afternoon session was introduced by Cecile Wright, who thanked the team in the Race and Diversity Unit for their work in what was often a difficult area. The MPA was now required by law to carry out race equality impact assessments and it was essential that it did them well.

Julia Smith and Nigel Adams each presented the equality impact assessment processes for the MPA and the MPS respectively. Dianna Yach gave an overview of good practice in Equality Impact Assessments. (These presentations are attached.)

Julia Smith clarified the MPA definition of policy: this did not only refer to written policies, of which the MPA had only a few. It also covered committee decisions, which often had a significant impact, ministerial and governmental directives, the results of best value reviews, and annual policing priorities and plans. The process aimed to challenge those organisational procedures which perpetuated discrimination. The aim was to review 150 policies by 2005. So far 20 policies had been reviewed. The MPA was setting priorities for the order in which policies should be reviewed.

Key areas where more work was needed were consultation, and finding and collecting evidence and information about the potential impact of any policy.

Nigel Adams said that the MPS took the view that everything it did was affected by the RR(A)A 2000; this meant not just policies but also decisions and operations. The MPS was starting at the level of corporate policy; it would then look at local policy in the 32 borough command units, and finally any other policy areas. Detailed operational procedures were also being assessed as well as the high level policy.

Points made in response to questions at this stage included:

- Increasing awareness on the part of those responsible for policy development about whom and how to consult was one of the hardest

areas to tackle. Real consultation was a challenge which could mean putting people in difficult situations and required the organisation to hear things it would sometimes prefer not to hear.

- Another key area was ensuring that training needs were identified and training was provided to ensure that those making decisions about potential impact of policies had sufficient knowledge and understanding, for example, of diversity, to be able to make those judgements.
- The MPS 'owned' its own policies and the MPA role was that of scrutiny. At what point should be MPA be involved in MPS impact assessment? There was an issue of governance here which required further discussion.

FEEDBACK FROM GROUP WORK

The key points made by participants were as follows.

- *Ensuring compliance with the general duty*

The process on its own could not ensure compliance but it was a good first step. The initial screening process should clarify whether this procedure related only to race or to all diversity strands; the same issue needed clarification under question 8 of the main assessment form. Question 4 of the initial screening section should also ask for details of who had been consulted, how this had been done and what had been learned from the consultation. More probing was needed at this initial stage.

It was difficult to ensure compliance in cases such as the Best Value reviews, when the impact assessment was being conducted after decisions had been taken and not before. In these cases, should that mean that the review decisions should be re-examined and amended if need be? This was likely to be a transitional problem.

What seemed to be missing in some policy reviews that were considered was evidence that the person conducting the review had sufficient knowledge and understanding of the range of diversity issues and evidence of what information and factors had been collected in order to make an assessment. This was particularly crucial at the initial impact stage where some explanation was needed as to how the person reached the decisions. Yes/No tick boxes were not enough.

The process overall needed simplification and clarification to ensure it was understood by the staff required to make the impact assessments.

- *Enhancement of MPA policy development and review process*

It was felt that the process in itself would have enhanced staff awareness of the impact of policy on different communities and also their awareness of key stakeholders and people to consult.

- *Gaps in the process and areas for improvement*

As before, participants noted lack of consistency between the first and second sections in relation to which areas of diversity were to be covered. Questions 9 to 11 were felt to be confusing.

Lack of evidence for answers was also noted in some of the sample policies.

It was suggested that there might need to be a different process for impact assessment of committee decisions as opposed to written policy.

More guidance for staff was needed on completion of the form, together with a Code of Practice on consultation and monitoring. A clearer and more robust definition of stakeholders was required.

The order of the process should be reviewed, as consultation and information gathering came too late in the process – evidence was needed at an earlier stage.

There needed to be consistency of terminology – for example the guidance notes had a different heading to the form itself.

More training for policy developers was required, and each section or unit should have a diversity champion who could ensure the process was conducted as thoroughly as possible and to provide support and guidance for staff.

The policy assessors should be asked to make clear recommendations to the MPA as a result of the impact assessment.

The MPS staff associations could be a useful source of internal consultation.

The form should provide more space for inclusion of evidence.

Other factors to take any account included the impact of policy on refugees and asylum seekers, on travellers, and issues related to language and interpretation in the consultation process.

More lateral thinking was required about achieving meaningful external consultation.

4. NEXT STEPS

Participants were thanked for all their work and contributions. Thanks were also expressed to the MPA staff who had provided such good administrative support for the day.

A report of the workshop would be compiled by Ionann and circulated to everyone who attended. At a later stage there would also be feedback about the results of the consultation. This consultation had taken place at a very early stage while the documents were still under development. The advantage of this was that the comments and perceptions of participants could be used to make real improvements in the equality impact process.

Attached

List of participants
Presentation slides

Ionann Management Consultants Limited
March 2004

**List of Participants: Equalities Consultation Workshop
23rd March 2004**

1. Henry Velleman
Chair of Victim Support London
2. Clare Taylor
Field Officer, London
Development, Victim Support
3. Makhan Bajwa
Director of Greenwich CRE
4. Mr Sam Bell
Enfield REC
5. Mr John Azah
Director of Kingston REC
6. Marcel Vige
Diverse Minds Manager (MIND)
7. Najeeb Rehman
Diversity Partnership Officer
City of London Police
8. Ossie Stuart
Greater London Action on
Disability (GLAD)
9. Rafiu Williams
Project Manager (MiNet)
10. Patricia Oakley
London Fire Brigade
11. George Mills
Senior Officer, London & South
Regional Team, CRE
12. Phil Pavey
Senior Officer, Police Formal
Investigation Team, CRE
13. Julia Smith
MPA, R&DU
14. Cecile Wright
MPA Member, Chair of EODB
15. Catherine Crawford
Clerk to the Authority, MPA
16. Kirsten Hearn -
MPA Member, LGES lead
17. Karina Horsham-Maynard
MPA, R&DU
18. Peter Day
MPA, R&DU
19. Yvonne Peart
MPA, CLAMS
20. Anju Sharma
MPA, Senior HR Advisor
21. Diana Yach
President, Ionann Management
Consultancy Limited
22. Anne Dunn
Ionann Management
Consultancy Limited
23. Nigel Adams
MPS Policy Clearing House
24. Brett Dalby
MPS Policy Clearing House
25. Colin White
MPS Diversity Directorate
26. Martin Wilson
MPS Diversity Directorate
27. Tyron Wynter
MPS Independent Advisory
Group
28. Subodh Rathod
MPS Independent Advisory
Group