

Text highlighted in blue must not be changed

EQUALITY IMPACT ASSESSMENT

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

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

Protective Marking:	Not Protectively Marked	Publication	Yes		
Title:	Delivery of linguistic support utilising video conferencing				
Branch / OCU:	HR Logistical Services - MPS Language Programme				
Date Created	21.06.2010	Review Date:	21.06.2011	Version:	1.5
Author:	Chief Inspector Jon Thomson				

Person completing EIA: Jon Thomson - Head of Operations		
Signed: _____	Date: _____	
Person supervising EIA: Michael Brooker (Director of Languages)		
Signed: _____	Date: _____	
Quality Assurance approval:		
Name: _____	Unit _____	Date _____

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

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

Purpose: To deliver an enhanced level of linguistic support to staff and Communities by implementing and managing the introduction of a video conferencing platform across the MPS. **Interpreters will also be considered alongside other groups although they are not “employees” of the MPS. (Self employed versus Employee)**

Aims:

1. To provide a greater degree of choice in determining which mode of linguistic support can be utilised to service a given task.
2. To provide much speedier access to linguistic support, to service operational and community related tasking.
3. To afford greater access to the Criminal Justice System for members of vulnerable groups.
4. To provide greater linguistic support for Victims and Witnesses and Detainees.
5. To realise cost savings in “travelling” time for interpreters.
6. To provide an enhanced level of linguistic coverage across the MPS.
7. To improve the levels of linguistic support for MPS Boroughs that have traditionally been devoid of or restricted in terms of the level of interpreter coverage.

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

- Current interpretation statistics
- Results of user group interivews
- Consultation with S.A.M.U.R.A.I (Staff Associations)
- Consultation with the Police/Staff Federations
- Advice from DFCD - Savi Bhrama
- Advice from HR CO1 - Richard Callegari
- Consultation with HMCS (Her Majesty’s Court Service)
- Consultation with CPS (Crown Prosecution Service)
- Consultation with LCJP (London Criminal Justice Partnership)
- Consultation with HR Director - Martin Tiplady
- Consultation with the Law Society
- Consultation with the Ministry of Justice
- Consultation with MPS listed interpreter (413)
- Consultation and study ongoing with Surrey University

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

Does this proposal have any relevance to:

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

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

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

5. Consultation / Involvement – see step 5 of the guidance http://intranet.aware.mps/TP/DCF/index.htm					
Who was consulted?					
See list in question 2					
Date and method of consultation					
The consultation took the form of face to face interviews, meetings and focus groups.					
Where are the consultation records stored?					
The records are kept by the project management group.					
Give a brief summary of the results of the consultation / involvement? How have these affected the proposal?					
See below.					

6. Full Impact Assessment – see step 6 of the guidance http://intranet.aware.mps/TP/DCF/index.htm Explain the potential impact (whether intended or unintended, positive or negative) of the proposal on individuals or groups on account of:					
Age					
There are no guidelines that preclude the use of the video conferencing platform to deliver linguistic support to an individual <i>purely</i> due to their age. The guidelines that are contained within the Language Programme Standard Operating Procedures (SOP) require the age of a person to be considered alongside other “risk” factors that together may determine that the video conferencing platform is not the mode by which to deliver linguistic support to an individual on any given occasion. A juvenile (A person under the age of 17 years as decreed under the Police and Criminal Evidence Act 1984) should immediately warrant further consideration, although would not this factor would not automatically negate its use.					
Disability					
There are no guidelines that preclude the use of the video conferencing platform to deliver linguistic support to an individual <i>purely</i> due to physical disability. Victims and Witnesses with physical disabilities will be directed to attend one of the MPS sites that comply with DDA regulations in terms of access to services. The Language Programme intends to take a pragmatic approach to ensure that all Victims and Witnesses are afforded equal access to linguistic support. The sites that afford enhanced levels of wheel chair and/or pedestrian access will be clearly publicised to Communities. There are guidelines that will automatically preclude the use of the Video Conferencing Platform to all individuals that self declare, or are deemed to be suffering from a mental disability. The Language Programme Standard Operating Procedures will allow for the declaration of these risk factors at an early stage in the investigation or detention of an					

individual(s). This type of declaration or assessment would ordinarily necessitate the use of a face to face interpreting resource. The same advice will apply to those who have a learning disability where face to face interpreting will always be advocated.

The older Deaf Community tend to have an innate suspicion of Video Conferencing in terms of the security of their personal data. Members of the older Deaf community will be consulted and have access to the video conferencing network to dispel and promote its use, particularly amongst their peers who have historically been unable to, or unwilling to access the Criminal Justice System. There will be continued dialogue with the user group to ensure that the system is meeting people needs this will include details such as positioning of monitors + audio quality which have already in part been flagged up as potential issues.

Again if any of these factors prevent from adequate interpreting taking place via a video link, then measures will be taken to ensure that face to face interpreting is made available
Interpreters: Those interpreters that declare they have a physical disability will be directed to attend one of the eight separate hub sites that afford greater access to them. This will be reliant on early self declaration from the interpreter(s) involved.

Religion and Belief

The impact of video conferencing on particular faith groups is still unclear however early issues indicate that certain faiths may be reluctant to use technological equipment during particular fasting periods or for the process to be explicitly against the principles of specific religious groups .In all such cases usage will continue to be monitored to provide continual assessments of how the video conferencing facility will impact upon particular religious groups or beliefs. This is to ensure that any issues that were not highlight in the initial EIA can be considered and the appropriate adjustments made. However the SOPS will advocate face to face interviews if it becomes apparent that the video conferencing facility is leading to distress or distrust of the process.

Gender issues including trans issues

No significant adverse impact has been identified in relation to gender however issues relating to more than one characteristics i.e. BME+ gender, BME males, Gender and mental health + disability issues will need particular attention and as stated above if any issues are identified either prior to or during the interview a more preferred method of interpretation will be sought.

There are particular issues related to the trans community, the first of these is the issue of disclosure at the interviews. The Gender recognition Act and now the New Equality Act prohibits disclosure (unless this is integral to the interview).Again advice has been sought and the SOPs give guidance on appropriateness of using the video conferencing facility in such instances. The second issue relates to the actual equipment and the quality of sound afforded by the video links to ensure that a person undergoing gender reassignment and whose voice is altered will be not be disadvantaged by the process. This will require continual monitoring to ensure that the current process does not adversely impact upon the trans community as no significant information is in place at present in order for a valid assessment to be made.

Race

The initial indications identify that as with Age- BME groups may be less familiar with the video conferencing technology and therefore not fully engage throughout the process. In addition to this there may be issues relation to body language and eye to eye contact which may significantly impact upon the interview process; This is particularly relevant to some BME women. Again the SOPS will advocate the use of face to face interviewing if

the video conferencing facility is not conferencing appropriate.
LGBT
Similar issues apply to that stated in relation to the trans community in that disclosure of a person's sexual orientation needs to remain confidential unless expressly requested not to do so by the person being interviewed or it is integral to the interview. Again face to face interviews will be advocated if this is appropriate.
Other issues

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

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