



Metropolitan Police Authority

Metropolitan Police Authority Disability Equality Scheme Update for 2007

1. On the 6 December 2006 the Metropolitan Police Authority (MPA) published its first Disability Equality Scheme (DES). The DES highlights how the MPA will continue to tackle discrimination, promote equality of opportunity and promote good relations between all people in the areas of service provision and employment. The last 12 months has been a busy time for the MPA; the organisation has recently undergone, as part of its improvement programme, an internal restructuring process. This process was carried out so that the way in which the MPA conducts its business of scrutinising, overseeing and holding the Metropolitan Police Service (MPS) to account is far more rigorous and efficient. Londoners in the MPS. The MPA has learnt this through ongoing dialogue with community members who attend many of our public committee meetings including the MPA Equal Opportunities and Diversity Board (EODB). The MPA chose to conjoin the internal restructuring exercise with the development of the MPA Generic Equality Scheme (GNES)¹ so that whilst all staff considered new ways of working in our business plans, policy making and everyday business we also thought about and involved Deaf and disabled people at the same time.
2. As part of the MPA Improvement Programme (in April 2007) the Community Engagement Unit and the Crime and Disorder Reduction Partnership (CDRP) Team merged to become the Engagement and Partnership Unit (EPU). Between April and December 2007 arrangements have been developed to deliver the new EPU. Staff have been recruited and an interim manager was put in place to develop the new unit and its terms of reference. The permanent EPU manager commenced employment on 1 February 2008.
3. The work of the EPU is divided on a largely geographical basis, with 8 officers having responsibility for 4 boroughs each and some cross-cutting tasks/policy leads such as officers lead on working groups, problem solving conferences, Safer Neighbourhoods, Stop and Search Scrutiny, community engagement development work etc. A support team of 3 is currently being set up (2 posts have been filled). Future work of the unit will include closer working relationships with the London-wide Race Hate Crime Forum (LRHCF) and the MPA Domestic Violence Board. The new EPU will continue to have the Community Engagement and the CDRP generic work areas as set out below.
 - to support the MPA's scrutiny and governance role in implementing the MPA and MPS joint community engagement strategy²;
 - to transform community engagement at the borough level in order to help Londoners secure more responsive borough policing;

¹ The MPA Generic Equalities Scheme is a document that is being developed to integrate our equalities and diversity work. The document will recognise that most people belong to more than one community and group and can experience discrimination on several levels from different perspectives. The DES is a significant strand of the GNES, and once the GNES is completed it will still be possible to make a distinction (through our reporting and recording mechanisms) between the six equality strands that the document will cover, namely age, disability, gender, race, religion or belief/non-belief and sexual orientation.

² Agreed at Full Authority 28 September 2006 [MPA: Committees: MPA reports - 28 Sep 06 \(08a\)](#)

- to enlarge the MPA's community engagement at a pan-London level and ensure that the viewpoints of Londoners inform the whole of the MPA's decision making and planning process;
 - to continue to serve London's diverse communities; and
 - to strengthen the awareness, skills and capacity by which Londoners can effectively engage in the policing of London.
4. Although the MPA welcomed the Disability Discrimination Act (DDA) 2005 our journey, like many other public bodies, has not been a totally smooth road. Transforming the way in which our organisation delivers its services, as well as adapting to the new legislation, has enabled the MPA to improve significantly in terms of the way in which we engage with Deaf and disabled people³ but we still face challenges. The MPA acknowledges the importance of this work because Deaf and disabled Londoners comprise 16 per cent of London's working age population, around 800,000 people⁴. **Deaf and disabled people** are defined here as those who have a current long-term disability according to the DDA definition of disability⁵.

Reference: Disabled people and the labour market in London: key facts Analysis of the 2005 Annual Population Survey, GLA, March 2007.

5. This paper sets out what the MPA has achieved over the last 12 months whilst striving to implement our DES action plan as well as the challenges that we still face and how we plan to overcome them. This update is in accordance with the Disability Discrimination Act 2005, which requests that public bodies publish an update one year after publishing their first Disability Equality Scheme. Through our user involvement events and public consultation nine overarching themes emerged, these themes defined our priority areas and include:
- Challenging hate crime
 - Developing ways of monitoring performance
 - Developing access initiatives
 - Review and improve our communication strategies
 - Review our human resources policies
 - Respecting Deaf and disabled peoples experiences
 - Disability Equality training
 - Ensuring that Deaf and disabled peoples views are represented
 - To continue to develop involvement strategies

The themes provide the headings in this paper, and progress in implementing our DES action plans across the whole of the MPA is explored under these headings.

³ The MPA recognise and celebrate Deaf culture. Many Londoners who use British sign Language see themselves as a linguistic minority not as 'disabled' people. Deaf (with a capital D) is a way of describing a culture with its own sign language.

⁴ GLA estimate calculated by applying 16 per cent to the official mid-year estimate for 2005.

⁵ The **DDA definition** relates to those who identify themselves as having a current disability covered by the 1995 DDA. This covers people who said they had a health problem or disability they felt would last for more than a year and who said this problem or disability would 'substantially limit their ability to carry out normal day-to-day activities' Additionally, people with progressive illnesses (e.g. cancer, multiple sclerosis, symptomatic HIV, Parkinson's disease, muscular dystrophy) are also included under this definition.

Challenging hate crime

6. The current remit of the MPA Race Hate Crime Forum (LRHCF⁶) focuses on race and faith hate crime and excludes work around disability. In exploring this area of diversity, the MPA Equality and Diversity Unit (EDU) has consulted and held discussions with Deaf and disabled community members to explore how disability hate crime issues can best be addressed through the work of the Forum. The LRHCF is also being reviewed as part of the MPA Improvement Programme. Whilst the immediate position of the Forum is unclear (MPA members will need to make that decision), there is a possibility, if it continues, that it would include disability hate crime as an additional focus area by making appropriate links with Deaf and disabled people, disability advisory groups and organisations who can act as advisors in this area.
7. The ability to record crimes against those identified as Deaf and disabled became available in April 2005 but there have been difficulties of compliance with the new method of recording. Therefore, recording was slow in starting. Thus from April to November 2005 victims recorded with a disability made up 1% of those victimised, 4795 out of 598766 compared with April to November 2006 where 3% of the victims with a disability were identified, 15838 of a total 549047.
8. Information compiled from the MPS Strategy Unit (who report on disability and the recording of crime) about the trends in data collected from April 2005 to November 2005 compared against April 2006 to November 2006 showed that:
 - disability affects 1.4 million people across London, and while many become victims of crime, current information suggests they are substantially less likely to be reported than non-Deaf and disabled people;
 - Deaf and disabled people are nearly 7 times less likely to be a victim of crime than non Deaf and disabled people;
 - the detection rates recorded against those with a disability is 3% lower than for those without a defined disability and those with a physical disability faring worse in this respect than those with a psychological disability.

Current Trends

9. The 2001 Census recorded the population of London as 7.4 million people. With regard to being a victim of all crime, the general rate of victimisation is 78.6 per 1000 population. For victims with a disability this rate is 19.6 per 1000 population. For particular crime types the comparisons are illustrated as the following:
 - burglary, Deaf and disabled, 2 per thousand, other 8 per thousand;
 - criminal damage, Deaf and disabled, 1.4 per thousand, other 10.2 per 1000;
 - theft, Deaf and disabled 4.1 per thousand, other 34.9 per 1000;
 - violence against the person, Deaf and disabled 2.9 per thousand, other 17.1 per 1000.
10. We know that different types of disability suffer a higher proportion of certain types of criminal activity than others. For instance, victims with a physical disability are more likely to be the victims of higher rates of property type offences such as burglary at 5%, criminal damage at 60% and theft at 44% as a percentage of all victims with a disability. Whereas victims with a psychiatric or psychological disability were more

⁶ The RHCF is a multi-agency partnership led by the MPA, which provides scrutiny and leadership in improving co-ordination and collaboration among agencies responding to race and hate crimes in the capital.

likely to be victims of physical abuse, such as sexual offences 59%, robbery and violence both 26% of all Deaf and disabled victims.

11. When each category of disability is viewed on its own, theft is the major category for both physical and communication types of disability followed by burglary for those with a physical disability and violence for those with a communication disability. Victims with a psychiatric disability are much more likely to face a crime of violence up to 44%.⁷

Detection Rates

12. Crimes against Deaf and disabled people are not solved to the same extent as other crimes.

The overall detection rate for victims who are not Deaf or disabled is 11% as opposed to 7% for victims who are. The biggest difference in terms of crimes in the general population and crimes against those who are Deaf or disabled is noted against 'violence against the person' with a 10% lower detection rate followed by sexual offences with a 6% lower detection rate if the victim has a disability. This decrease in detection rate is reflected across all types of disability but victims with a psychiatric or psychological disability have a 10% chance of having their crime detected followed by those with a communication disability at 9% and those with a physical disability at 7%.

13. The MPA RHCF recognises the impact of disability hate crime and will engage with organisations established to address issues of hate crime against those with a disability.

Developing ways of monitoring performance

14. The MPA Planning and Performance Unit commissioned a paper investigating disability and the recording of crime. The paper looked at crime recorded between April and November 2006 compared to April and November 2005.
15. The codes for recording disability became available in April 2005 and as is always experienced with new codes, compliance in recording was slow in starting. Thus in April to November 2005 victims with disability made up 1per cent of the victimised, compared with April to November 2006 where victims with a disability were 3per cent of the total.
16. More recent information has been requested for the MPA Equal Opportunities Diversity Board⁸ (EODB) committee in November 2007. This showed that the number

⁷ All figures in paras 6 –13, taken from the 2001 census.

⁸ The MPA committee, that leads on all issues relating to equal opportunities and diversity within the MPA and the MPS.

of Deaf and disabled victims has remained fairly static at 21,300 for a 12-month period. Theft is the most common crime committed against both Deaf and disabled and non-Deaf and disabled victims.

17. The Planning and Performance Unit has been involved in re-designing the questionnaire for the public consultation process to determine the policing priorities for 2009-10. To ensure that the process takes into account of concerns affecting different communities, in London the Planning and Performance Unit has ensured that the questionnaire includes a full diversity section, including sections for all 6 equality strands (**age, disability, race, religion and belief/non belief, gender, sexual orientation**). This will not only enable the MPA and MPS to monitor who is completing the questionnaire but will enable analysis to be conducted on the results detailing specific areas of concern for particular groups of people.
18. The Planning and Performance Unit has also assisted in designing a questionnaire to be used in the youth crime scrutiny⁹. The demographic section of the questionnaire will include details of disability as well as the other five equality strands. Although completion of this information is voluntary, it may give a better understanding of the issues affecting Deaf and disabled young people.
19. The role of the MPA Internal Audit (IA) function is to examine the business systems of the MPS independently from line-managers. The examination is intended to verify that an adequate level of internal control is maintained within all systems, including financial systems, and that policies, procedures and practices are complied with. It also verifies that the system operates effectively, efficiently and economically. The aim is to examine all systems over a five-year cycle, except for those systems that are deemed to be material systems by the Audit Commission, i.e. major financial systems, which are reviewed at a greater frequency. IA forms part of the MPA corporate governance arrangements and reports to the Corporate Governance Committee of the Authority.
20. In examining all systems the audit staff are mindful of equalities and diversity issues, including the needs of people who are Deaf and disabled, and, when appropriate, make recommendations to improve practice and procedures. Over the last twelve months, no requests were made for Audit reports in alternate formats; however a provision remains that if there are specific requests for this service IA will aim to meet the needs of the recipient. Progress on recruitment and promotion exercises continues. IA will continue to make adjustments to meet the needs of Deaf and Deaf and disabled people. e.g. consulting the Deaf or disabled candidate and appropriate advisers on the needs of the individual candidate. Evidence of this can be seen within two recent recruitment campaigns conducted in 2006/7, and on each occasion appropriate adjustments were made to meet requirements of candidates

Developing access initiatives

21. The term 'access' can relate to physical and easy access into and around our buildings and public spaces. There are many factors contributing to physical accessibility, the most obvious being the building shell. However, it is also important to consider fixtures and fittings, furniture and equipment. It is also vital to consider how a building is used. How a building is managed in its day-to-day operation will have a significant impact on how easy the building is for Deaf and disabled people to use. Awareness and attitudes of staff and helpers are critical for the safe and convenient use of the building. For these reasons, the MPA disability access audit also took into consideration the role of management, staffing and staff training as well as physical aspect. It is important to note that the MPA are tenants in the building we occupy and are resident on the ground, first, second and part of the third floor.

⁹ The Youth Scrutiny is discussed in more detail from paragraph 52.

22. Access can also relate to the potential environmental barriers that Deaf and disabled people may face in regards to meetings, policies, processes or systems in the work that the MPA does. The MPA is committed to working in partnership with Deaf and disabled people to achieve a barrier-free environment. As part of this commitment we commissioned the Centre for Accessible Environments (CAE) to carry out an access audit on our building (10 Dean Farrar Street). The access audit was completed in November 2007.

The key findings of the access audit report included:

- that there is no suitable, level parking space near the entrance to the building for visitors. The question of providing lift access from car park to ground floor level was explored. It was recommended that the provision of an accessible visitor car parking space, inside the basement car park, be investigated. This would provide a more accessible route from parking to building for visitors;
- due to security issues, the access to all MPA floors is via a swipe card and push button security system. Both swipe and combination codes are required for entry. This may be difficult for some people, particularly those with visual or manual dexterity difficulties. It was recommended that, where practicable, a simple entry system be provided by means of a simple proximity or swipe card access, for ease of use by people with limited manual dexterity and vision;
- many MPA committee meetings/events rely on the use of the ground floor meeting rooms. However, only one meeting room out of four is fully accessible for wheelchair users and others unable to use steps. As the principal areas that are accessed by members of the public, it was recommended that level or ramped access is provided to as many rooms as possible;
- accessible WCs – the report acknowledged that the toilets fall within landlord areas, though a number of recommendations were still made. The principle issue noted was that the accessible WC compartments do not meet current good practice guidance. The compartments sizes are considerably less than recommended for accessible cubicles and grab rails are not suitably arranged. It was recommended that the WC be redesigned to give additional space in compartments with consideration given to removing the internal partitions and using entire space to create two unisex accessible toilets.

Reference: Access Audit Report, Centre for Accessible Environments, November 2007.

These issues are all currently under review and at the time of writing this report the MPA have met DDA requirements including:

- conducting a DDA Audit;
 - providing turning circles, signage, floor/ wall and ceiling contrasts;
 - providing unobstructed access/egress, colour differentiation and contrasts, vision panels and handles/knobs;
 - Induction loop facilities have been installed in all public meeting rooms since 2002 and updated in 2006. Strobe alarms were also fitted to assist in the fire evacuation procedure. They are also now installed in meeting rooms and on office floors.
23. In regards to all public committee meetings, the MPA Committee Liaison and Members Services (CLAMS) are responsible for ensuring that any 'access' requests for assistance are met promptly, for instance by having identified in advance sources of assistance, such as alternative formats for reports, or communication support such as BSL Signers, Palantypists etc. This remains one of the objectives for the unit in

2007/08. CLAMS are also responsible for Member recruitment¹⁰. The process for the new round of member recruitment is due to begin Spring 2008.

24. All MPA members must follow a code of conduct. In 2007 a new national Model Code was produced by the Association of Police Authorities (APA), which the MPA has adopted in full. Through ongoing guidance to members on the Code we will look to ensure that they are made aware of their DDA obligations. A new development for this year, and one that ties in with level two of the Equality standard,¹¹ is that each committee now has an equalities (include disability) objective in its terms of reference. This objective will now be included in each committees work plan.
25. Existing provisions will be kept under review. In conjunction with CLAMS, arrangements will be made for all complaints about MPA premises or facilities to be recorded and responded to, and for the register to be reviewed half yearly by the MPA Senior Management Team (SMT). As mentioned earlier, in accordance with the MPA Access audit recommendations, - the building landlord has also been approached to consider improving the accessible toilet facilities in the basement, to meet the requirements as set out in our accessibility audit. The MPA are also working on removing the environmental barriers to better enable Deaf and disabled people to work for the MPA. We therefore positively support the work of other public bodies such as Jobcentre Plus. They have sponsored a new website, spearheaded by the Department of Work and Pensions (including Remploy, GMB, the Office of Government and Commerce, and the British Association of Supported Employment) which has been established to help bridge the gap between Government procurers and Deaf and disabled people. The website states that;
26. 'There are over three million disabled people of working age in the United Kingdom with some form of disability'.

Reference: www.remploy.co.uk, December 2006

The MPA are committed to playing their part in ensuring that Deaf and disabled people are able to successfully compete for a diverse range of contracts. In terms of procurement within the GLA Family Group¹², Sustainable Procurement has been

¹⁰ The Metropolitan Police Authority has twenty-three members, twelve from the London Assembly appointed by the Mayor, four magistrates appointed by the Greater London Magistrates Courts Association and seven independent members, one appointed directly by the Home secretary, with the other vacancies appointed after being advertised openly. Members are appointed for a period of four years. The Chair of the MPA is chosen by the members themselves, all of whom are eligible. Each member is linked with at least one borough. This means that wherever you live a member is taking a keen interest in policing issues in your area.

¹¹ The Equality Standard for Local Government (ESfLG) sets out a generic equality framework to mainstream and audit equality of opportunities across all parts of the authority. There are five levels of the Equality Standard. Level 1 is the lowest and 5 is the highest. For each of the levels there is a list of indicators, for which the MPA has to provide evidence. The MPA has been self-assessed as Level 2 and is moving to Level 3 by July 2008.

¹² The Greater London Authority (GLA) has a directly elected Mayor, and a separately elected London Assembly. Both the Mayor and the London Assembly are elected for fixed terms of four years. The next elections will be in 2008. The Mayor of London has a range of specific powers and duties, and a general power to do anything that will promote economic and social development, and environmental improvement, in London. Before using many of his powers the Mayor must consult with Londoners and, in all cases, the Mayor must promote equality of opportunity. The Mayor sets out plans and policies for London covering transport, buildings and land use, economic development and regeneration, culture, and a range of environmental issues (including biodiversity, ambient noise, waste disposal and air quality). These plans and policies must also contribute to sustainable development and the health of Londoners.

The Mayor sets the annual budget for the following bodies:

relabelled as Responsible Procurement. The MPA Treasury Unit is a member of the steering and working groups, who aid the development of the 'Responsible Procurement Annual Report'. The next report is due to be published in early 2008 highlighting the good practice achieved by the GLA Group – e.g. the level of expenditure with diverse suppliers used. There is now a database for use by the GLA Group holding information on small and medium enterprises that can be approached to tender for work with the group. An objective (for the Treasury Unit) for the future is to make the procurement process easier to access by diverse suppliers, including those owned/ managed by people with disabilities.

Review and improve our communication strategies

27. At recent events that the MPA has hosted and at informal meetings with community members, it is clear that the MPA need to do more work around raising the organisation's profile within the wider Deaf and disabled communities. There is often confusion between the distinct roles that the MPA and MPS hold. Therefore one of our actions within the MPA DES (under the Communication Unit) was to develop a greater understanding of the MPA's role among Deaf and disabled people and disability groups, and for the MPA to increase the use of our information by specialist disability media. An example of how we have pushed this agenda is doubling the number of languages on our website from 8 to 16¹³. We also provided specialist translations of the MPA's counter-terrorism report¹⁴. The report summary was provided in Easy Read and BSL.

28. In terms of our online communication, the MPA is committed to actively promoting our website to Deaf and disabled people and to work with Deaf and disabled people to ensure its accessibility is maintained and enhanced. We have received positive feedback of our efforts to enhance accessibility from other organisations and the media.

Review our human resources Policies/ Disability Equality training

29. There are two separate and distinct HR functions within the MPA. The first is the internal function that deals with managing and administering traditional HR activities, e.g. recruitment, selection, terms and conditions, termination of staff etc. This unit is also responsible for the development of the Employment Framework, e.g. terms and conditions of employment and associated policies, procedures and practice guides and for the provision of advice to line managers and employees on the interpretation and implementation of the Employment Framework.

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- the Greater London Authority
 - the Metropolitan Police (who provide policing in the capital under the oversight of the Metropolitan Police Authority)
 - Transport for London (which is responsible for managing London's buses and the underground, river services and some light rail services, maintains London's main roads, regulates London's licensed taxi and private hire services.
 - the London Development Agency (which works with business to sustain and improve London's role as a business centre, while increasing economic opportunity for all Londoners)
 - London Fire Brigade (which responds to fires and promotes fire prevention, under the oversight of London Fire and Emergency Planning Authority)

These organisations constitute the GLA family group. Reference: www.london.gov.uk

¹³ Translation is available in Arabic, Bengali, Chinese, French, Greek, Gujarati, Hindi, Japanese, Polish, Portuguese, Punjabi, Somali, Spanish, Turkish, Urdu, and Vietnamese.

¹⁴ A wide-ranging inquiry into the causes and effects of Terrorism amongst our diverse communities. <http://www.mpa.gov.uk/downloads/issues/counterterrorism/ctld-22feb07.pdf>

30. At a strategic level, the internal HR function is responsible for advising and supporting the SMT on the development and implementation of a strategy for managing the Authority's employees to work efficiently and effectively in achieving the Authority's mission and vision. This includes the implementation of the Authority's Improvement Programme insofar as it relates to staff.
31. The second is the external HR scrutiny function which involves advice and support to the Authority's members and officers both in the effective scrutiny and oversight of the performance of the MPS and in undertaking their roles in the national employment advisory and negotiating bodies. The external HR function is also responsible for discharging the MPA's role in recruitment, selection, remuneration and retirement arrangements of Association of Chief Police Officer (ACPO) rank police officers in the MPS.
32. As part of the MPA Improvement Programme, the internal HR function priorities are currently being reviewed and will include implementation of the MPA Improvement Programme insofar as it relates to staffing. The MPA is a small organisation with small HR budgets (e.g. training) and HR staff numbers have been reduced recently to reflect a revised role. As a result, the ability of the Authority for generic training for all staff or major positive action initiatives is limited, although, for example, in 2004 staff received disability awareness training from 'Disability Matters' and other providers.

Other priorities include:

- more training for managers, e.g. in terms of HR policies and policy implementation; for staff in terms of their responsibilities, e.g. the six equality strands;
 - regular management information for SMT across a range of HR activities, e.g. sickness/return to work interviews, appraisals, induction/probation etc;
 - more quick time reviews of policies, guidance and practice in preparation for changes in equalities legislation.
 - one-to-one and online training options for managers and generic training programmes being developed, including a comprehensive induction programme and specific 'management' and 'management of HR' courses for middle managers and revisions to the staff handbook to make it more accessible to all staff.
33. The Authority is still working towards being accredited with the 'two ticks scheme' that involves making five commitments to the community, although the Authority already guarantees to interview all Deaf and disabled applicants who meet the minimum criteria for a job vacancy and consider them on their abilities.
 34. As part of the MPA response to the GLA's Best Value Review "Equalities for All", we have signed up to the exemplary employer template and the social model of disability. The MPA is working towards developing and maintaining a suite of HR policies, procedures and working practices that promotes a positive working environment for Deaf and disabled staff.
 35. In 2007 we had two significant developments in terms of the HR review (which is being carried out as part of the MPA Improvement Programme), which included the commissioning and publication of the staff survey, and carrying out the Authority's Equal Pay Audit:
 - Staff Survey – In the autumn of 2007 the results of the staff survey were published. An element of the staff survey explored issues of disability in the workplace, as well as getting a better understanding of the numbers of Deaf and disabled staff that are working within the MPA. We sought feedback on how accessibility issues are currently managed or dealt with in the workplace. The results of the survey are being

considered in the current review of the HR policies. A follow-up staff survey will be commissioned in 12 –18 months time in order to measure impact and improvement across a range of internal issues, including disability. The outcome of this further staff survey will help shape MPA HR strategies, policies, procedures and working practices and take account of feedback from Deaf and disabled staff;

- Equal Pay Audit - during the course of the year the HR unit in conjunction with the Public Commercial Services Union (PCS) undertook a wide-ranging equal pay audit of the pay system by the end of the 2006 / 2007 financial year. It built on the work undertaken in 2004 and looked at potential discrimination on the grounds of disability. The outcome of the equal pay audit has provided the MPA with a benchmark for improvement in the area of pay for all staff.
36. The external HR function priorities are also being reviewed in consultation with members and MPA/MPS officers. The review will include workforce modernisation (a national programme to create a more flexible workforce and to professionalise policing), the HR implications of the restructuring of the MPS (including a shared service or call centre for HR) and reform of police. In order to progress this work the MPA have set up a member-led HR Oversight Group that meets every month and is intended to enhance the Authority's ability to scrutinise HR activities across the MPS through knowledge building. At each meeting there is a focus item on a particular area of HR business, e.g. Selection or Leadership, in addition to standing items on, for example, HR workforce data and progress towards meeting targets for under-represented groups and matters raised by staff associations and staff support associations, including the MPS Disabled Staff Association.
 37. One of the most tangible examples of the HR Oversight Group in action was the discussion of the Recruitment Directorate's draft community engagement strategy, which is aimed at ensuring the MPS will explore and undertake all forms of engagement required to improve the representation of all communities that are under represented in the workforce and in so doing, improve operational effectiveness and service delivery. The value of this to both the MPS and all London's diverse communities was well recognised and understood.
 38. There is also a standing item on the agenda dealing with staff association and staff support association issues that provide members with an opportunity to question the MPS about its policies and practices in respect of Deaf and disabled staff. For example, a recent Employment Tribunal decision about the MPS promotion process, which involved a Chief Inspector with a disability. In this case a Chief Inspector who is dyslexic was found by an employment appeal tribunal (EAT) to have been disadvantaged in comparison with his work colleagues in examinations for promotion, was disabled within the meaning of the Disability Discrimination Act 1995. Section 1 of the 1995 Act provides: "...a person has a disability for the purposes of this Act if he has a physical or mental impairment which has a substantial and long term adverse effect on his ability to carry out normal day-to-day activities". It was argued for the claimant that once it was accepted that the disability affected his ability to progress in his profession, the only reasonable inference was that it had a substantial effect on his day-to-day activities. Where it was not disputed that the employee was suffering a substantial disadvantage because of the effects of his disability in the procedures adopted for deciding between candidates for promotion, the only proper inference was that those effects must involve a more than trivial effect on his ability to undertake normal day-to-day activities. It would fundamentally undermine the protection, which the Act was designed to provide were it otherwise. There will be a hearing commencing 4 March to determine any financial award. The learning in this case was the clarity provided in respect of what constitutes day-to-day activities and reasonable adjustments.
 39. In addition, the MPA has initiated a member-led scrutiny in succession planning and talent management in the police service. This has some wide ranging terms of

reference which include: assessing the extent to which appropriate structures are in place, and resources available, to identify, select and support succession planning and talent management for police officers in the MPS and to understand what is being done to address under representation of all equality groups at senior levels. To this end, a questionnaire has been sent to all staff associations and all staff support associations seeking both their views and personal experiences.

40. The response of the Metropolitan Police Disabled Staff Association emphasised the importance of any positive action initiatives focusing on skills development and encouraging under represented groups to take part in selection processes, removing barriers and supporting work-life balance.

The responses to these questionnaires, in addition to oral evidence received from individuals, will be analysed in order to support any recommendations but they broadly supported a move towards looking at the experience of all equality groups and addressing them. One of the other issues the scrutiny has identified is the lack of reliable information on disability, faith or belief and sexual orientation, which will need to be addressed. The scrutiny is due to be finalised in February 2008

Ensuring that Deaf and disabled peoples views are represented/ Respecting Deaf and disabled peoples experiences

41. The events of July 2005 gave considerable concern to all Londoners and were of particular concern to Deaf and disabled people as to how their needs would be met in the event of an emergency in London. Anecdotal evidence provided to the Metropolitan Police Authority (MPA), the Metropolitan Police Service (MPS) and Transport for London (TfL) by individuals, community groups and the MPS Disability Independent Advisory Group (DIAG) indicated that though London may have been prepared for such emergencies, the needs of Deaf and disabled people had not been properly considered.
42. This raised grave concern within the MPA EDU because in 2003 the MPA and MPS acknowledged that there was an **urgent** need for a Disability Agenda within the MPA as it was clear that disability and policing issues were not largely known/understood. In order to address this a small Steering Group made up of the key partners in 'London Resilience' (the key agencies responsible for responding to an emergency in the capital), together with representatives from DIAG agreed to host a seminar on emergency planning.
43. The London Emergency Planning Seminar provided an opportunity for Deaf and disabled people to speak directly to the key decision-makers responsible for emergency planning in London. It was also an opportunity for those agencies responsible for emergency planning to explain to Deaf and disabled people what work they had done to date to make London safer for all of the capital's diverse communities
44. Over 150 delegates attended this event. The Seminar was chaired and facilitated by Alice Maynard (Director of Future Inclusion). Keynote speakers included David Morris (Senior Policy Adviser to the Mayor of London [Disability], GLA); Bryan Heiser (TfL member); and Kirsten Hearn (MPA Independent Member). An external facilitator, Pip Hesketh acted as Project Manager for this event. On the day, a number of key issues emerged as learning and developmental issues for the emergency planning partners:
 - the use of language: often officers from the emergency planning agencies used jargon, acronyms and inaccessible language to communicate their activities and responses to questions posed. This impacted directly on some delegates' enjoyment and accessibility of the Seminar.
 - the need for officers working in the emergency planning agencies to have a disability equality training

- some delegates wanted more Deaf and disabled people to attend; however, this was a balancing act between the capacity to meet a variety of impairments, health and safety considerations and allowing delegates to work in smaller workshops to learn more about emergency planning.
45. The steering group produced a list of the key recommendations emerging from the Seminar, which we and other agencies are working towards fulfilling.

Reference: MPA Equal Opportunities Diversity Board (EODB) paper: London Emergency Planning Seminar, September 2006

46. In terms of some of the ongoing Community Engagement work, the MPA has a role to work together with a range of organisations, groups and individuals in order to keep London safe. To do this it is necessary to build trust and confidence between police and the communities they serve. Of course we can only do this if we fully understand the concerns of every section of our society. The MPA have engaged with Londoners in a variety of different ways including a Counter Terrorism Debate: The London Debate.
47. The MPA engaged with over 1000 London residents and workers in Counter Terrorism: The London Debate. The process included;
- 6 pan-London hearings with specifically selected sections of London society;
 - 35 local consultations in London Boroughs;
 - 6 focus groups with students in London universities;
 - A written report, with recommendations.
48. Representatives of disability groups attended our 'Together Against Terror?' conference in December 2005, which gave rise to this programme. Deaf and disabled people participated in the various consultative activities, which constituted the programme of work. Deaf and disabled people from the Association of Blind Asians and the Association of Muslims with Disabilities attended. Deaf and disabled individuals were involved as an expert witness and as journalists who contributed.
49. The MPA are cognisant of some of the particular considerations of Deaf and disabled people regarding terrorism and counter-terrorism, including, for example, the need for communication in a variety of modes in a crisis situation, concerns that police officers should not only use audio cues when giving instructions to terrorist suspects, the need for an appreciation of why people with a variety of disabilities may be incorrectly construed by the public or police as acting suspiciously, and issues regarding the treatment of guide dogs in emergency scenarios.
50. One of the key messages that arose from this debate was; there is support across all of the communities for the police's counter terrorist effort. The MPA, following this inquiry, produced and distributed the 'Counter-Terrorism: The London Debate' report in a range of accessible formats including British Sign Language (BSL) DVD, Easy Read and audiocassette.

Reference: Counter Terrorism Debate: The London Debate, March 2006/(internal) MPA planning submission, Andrew Hull, October 2006

51. The MPA has a duty to monitor the performance of the MPS and secure continuous improvement in the services provided to the people of London. To help it carry out these responsibilities, the Authority undertakes in-depth projects, or scrutinies, into specific aspects of MPS performance. Members of the police authority, supported by the Scrutiny and Review Team, undertake these scrutinies. We use a number of criteria to identify areas of service delivery that would benefit from more in-depth scrutiny.

52. These include performance (particularly poor performance) resources, and implications for equality and diversity (e.g. disproportionality). At the start of any scrutiny or review, an assessment is carried out to identify which equality groups may be impacted (either positively or negatively). Appropriate arrangements are undertaken to ensure that this risk is minimised and potential positive impacts are maximised. Disability issues are addressed as part of the process on a case-by-case basis. An example of this is the current youth scrutiny; the MPA is examining the causes, effects and impacts of young people's involvement in crime as victims, witnesses and perpetrators and how this influences their interactions and relationships with the MPS. MPA members are leading the scrutiny.

53. The MPA aims to achieve the following with this scrutiny:

- The MPS sign up to, and implement, the recommendations that pertain to MPS practice and policy
- Other organisations and governmental bodies take into consideration the recommendations pertaining to their work to improve practice and policy in regards to youth victimisation and youth offending
- Reporting mechanisms meet the needs of young people, thereby resulting in **all** young people feeling more confident about reporting crimes to the police
- Quality of contact between all young people and the police improves noticeably
- MPS use example of good practice in regards to consultation practices sourced during the youth scrutiny to inform their engagement strategies.

54. In order to ensure that Youth Scrutiny Panel had expert input from other professionals working in the youth crime field, a youth worker and a representative from the Youth Justice Board have been recruited to the Panel. In addition, expert advice is being provided from the MPS by a Deputy Assistant Commissioner. In addition to the Youth Scrutiny Panel a Youth Reference Group of 25 young people aged 12 years – 20 years has been set up. The role of the Reference Group is to reality check the work of MPA officers and members and provide expert guidance and support in regards to the youth consultation strands of the youth scrutiny. In order to ensure that the Reference Group reflected London's diverse population, all 6 equality strands were considered when recruiting young people. Deaf and disabled youth groups were included in the list of organisations contacted¹⁵.

55. To accommodate the needs of all young people, it was agreed that transport would be provided to all young people who were concerned about safety. Unfortunately no disability organisations took up the offer to be involved in the core youth group, however, the group has two Deaf and disabled virtual members who do not attend meetings, but are contacted before and after each meeting for input and feedback.

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- ¹⁵ 50 Youth groups were contacted and all were asked to circulate the invitation to all Deaf and disabled youth members, in this list were 11 targeted groups that included
 - UK Youth Parliament
 - Muslim Youth Net
 - London City YMCA
 - Waltham Forest Council
 - MYAG
 - Kids Co
 - Federation of London Youth Clubs
 - Magpie youth group
 - Action for Kids
 - Bromley College - approached this college as it has a specialist needs class
 - Crofters Club

56. During the recruitment period, those groups who were unable to send representatives to take part in the youth reference group (including the Deaf and disabled groups) were informed that there were other methods of informing the Youth Scrutiny, this included an opportunity for the MPA to hold ad hoc consultation sessions with their young people. This offer was taken up by Bromley College and a consultation event was held with the College's special needs class. A series of adult stakeholder interviews were carried out between August – December 2007. Stakeholders were chosen based on the thematic priorities of the youth scrutiny. Questions put to adult stakeholders focused on the needs of all young people as victims, offenders and witnesses.
57. Youth consultation sessions will be held in accordance with MPS 4-way clustering of London (north east, north west, south east and south west) at 4 youth facilities in early 2008. Each host youth group (in each of the four areas), in partnership with the MPA, will be expected to invite a wide variety of young people and youth groups (including Deaf and disabled young people) to take part in the sessions. An offline and online survey will be available throughout January 2008 – February 2008, for those young people who are unable to or who do not wish to take part in the face-to-face youth consultation events. The online survey will be placed on the MPA website and on a youth specific website. The off line survey will be sent to youth groups across London.

To continue to develop involvement strategies

58. The Equality and Diversity Unit (EDU) is responsible for supporting the work of the EODB and ensuring the MPA equal opportunities and diversity strategic objectives are achieved. These objectives were set from 2004-2007. An update paper on progress against these objectives was received by EODB In December 2007.¹⁶ These objectives are an important step to enable the MPA and its staff to mainstream equality and diversity, ultimately enabling the MPA to more effectively monitor and scrutinise the work of the MPS, from public engagement with community representatives to supporting the work of members and staff. The EDU has responsibility for supporting the Domestic Violence Board, which was set up to monitor, scrutinise and support the MPS in its performance and response to domestic violence. The EDU is also responsible for providing secretariat support for the London Race Hate Crime Forum (LRHCF). Over the last twelve months the Unit has undertaken work around supporting the organisation to develop and progress its DES as well as our other Equalities Schemes. In particular the EDU have moved forward with work on the Equality Standard for Local Government (ESfLG¹⁷) and the MPA Domestic Violence Board.
59. The progress of work for these two strands has included:
- amending the MPA' s Equal Opportunities Policy to reflect recent legislative changes in relation to disability, gender and age;
 - signing off 12 Equality Impact Assessments (EqIAs) over the past year;
 - getting committees to set equality objectives;
 - commissioning briefs that consistently request of BOCUs performance information on disability ;(as well as across other equality strands)
 - having the chair of EODB as a member of the DV Board
 - detailed briefings and summaries to Board members;

¹⁶ See [MPA: Committees: EODB reports - 06 Dec 07 \(13\)](#)

¹⁷ The Equality Standard for Local Government (ESFLG) sets out a generic equality framework to mainstream and audit equality of opportunities across all parts of the authority. There are five levels of the Equality Standard. Level 1 is the lowest and 5 is the highest. For each of the levels there is a list of indicators, for which the MPA has to provide evidence. The MPA has been self-assessed as Level 2 and is moving to Level 3.

- inviting disability equality experts from London's diverse communities to contribute on a regular basis to the DVB.
60. The MPA is currently working towards securing level 3 of the Standard. An Equal Pay Audit has been undertaken and in November 2007, a Disability Access Audit of Dean Farrar Street was carried out, making a number of recommendations for consideration by SMT. It should be noted that when, following an emergency, the MPA had to vacate Dean Farrar Street in the summer of 2007, a number of steps were taken on return to the building to ensure access issues were dealt with as fully as possible. This was done in close liaison with the two chairs of the MPS Disability Independent Advisory Group. A report on MPA's progress in relation to the Standard will be submitted to EODB in February 2008.
61. The new EPU Unit continues to facilitate some key functions of the former Community Engagement Unit and Crime and Disorder Reduction Partnership Unit. Therefore one of the ways in which the public can continue to raise concerns about local problems and help improve the quality of local services is through the borough based Community Engagement Groups – the collective term used for Community Police Consultative Groups (CPCGs) and Community Safety Boards (CSBs).
62. These independent voluntary groups provide a mechanism for holding borough police and CDRPs to account and are a means of reporting back to local people. Examples of the impact that these groups have made with the support of the MPA include:
- Brent, Hammersmith and Fulham and Islington Community Safety Boards have now been established with the MPA actively ensuring recruitment from the Deaf and disabled communities.
 - The MPA led a survey carried out with members of Hammersmith and Fulham Action on Disability (HAFAD) to identify crime and disorder issues for the Deaf and disabled community. This survey was used locally to influence the Crime and Disorder strategy and priorities. As a direct result of the Director of HAFAD being actively involved in the Community Engagement Group (CEG), the Director was able to develop contacts with the Borough Commander. This relationship resulted in the Borough Commander asking the CEG for their support in helping the Management Team in the Borough develop its action plan for addressing the needs of Deaf and disabled people.
 - One borough found a solution to discourage thefts of the Blue Badge used in the Blue Badge Scheme¹⁸. The EPU has circulated good practice to CDRPs and is encouraging them to involve local disability groups so that Deaf and disabled people do not become targeted victims of car crime, do not lose the Blue Badge facility and their mobility, and do not lose other incidental property in the course of the theft of the badge.
63. In addition to the activities outlined above, the EPU regularly undertakes adhoc consultation activities. These additional activities are driven and shaped by legislative requirements/current policing priorities. The Authority recognises the potential Londoners themselves have to contribute to the safety and security of the capital. The MPA wants to enable London's communities to communicate their views and concerns on these critical issues, which we believe will lead to better informed police decision making and greater public understanding of the complexities involved.
64. Deaf and disabled people have participated in the various consultative activities, which constitute part of the EPU programme of work. The EPU team works to fulfil

¹⁸ The Blue Badge Scheme helps facilitate easier and more convenient access through car parking concessions. It is an extremely useful facility and the issue of Blue Badges is controlled strictly. As a result they have acquired a value that far exceeds their intrinsic worth and they have become a target for thieves who sell them for up to £500.

the MPA's statutory role under the Crime and Disorder Act 1998 on the 32 CDRPs across London. It is important to note that although the team does not deliver any service, or develop any policies directly, it advises and supports MPA link members to promote partnership working to reduce crime and disorder.

65. Since the MPA User Involvement events during the summer of 2006, the new EPU team have met and discussed the findings of the user involvement events and the associated community feedback. This has initiated discussion across the team about key areas of the EPU work, and where and how the team shall endeavour to heighten awareness across the CDRP partnership of disability issues. The team have developed actions associated with the community feedback and are incorporating these action into their work plan.

Challenges

66. The MPA has a couple of key challenges over the next 12 months, primarily because the organisation is still adapting to new ways of working and is still embedding new policies and procedures that were born out of the MPA improvement programme. A work stream of the new EPU unit is the Independent Custody Visiting Scheme (ICV). This enables members of the public to visit police stations unannounced to ensure that those held in police custody are being properly treated. There are approximately 400 custody visitors based in 32 London boroughs. Increasing diversity is an issue for the scheme and measures are to be taken to increase the diversity of custody visitors. It should be noted that, though this area of work is not community engagement as such, it enables Londoners to become actively involved in a core aspect of the MPA's work and fulfils one of the Authority's key objectives to strengthen the skills and capacity of Londoners so that they can effectively engage in the policing of London. Work is well under way to address concerns around diversity. For example:
- Visual prompt cards have been issued to all ICV panels for use during custody visits;
 - Recruitment and marketing materials have been developed and regular recruitment campaigns have been run in the press;
 - A wide range of community groups have been mailed information about the scheme, however groups representing people with disabilities have not been separately targeted.
67. The MPA needs to undertake more work in order to analyse the make up of the scheme across the six equality strands. We are looking into purchasing a personnel management system to manage our volunteer records and we would envisage being able to capture this information through that. This will be a key piece of work for the ICV unit over the next two years.
68. Additionally, the ICV unit have developed a suite of policies for the scheme. Recruitment guidance and an interview framework have also been developed. These policies and processes have all been Equality Impact Assessed¹⁹.
69. As part of the work in the former Community Engagement Unit, the MPA had a pan-London community engagement mechanism - the Safer London Panel. The panel comprised of 3,000 London residents who were regularly asked by the MPA to give their views on a wide range of crime, community safety and policing issues. At the time of publishing the MPA DES, statistics showed that 12% of panel members were Deaf and disabled people and a further 8% had a Deaf and disabled household member. As a comparison, data supplied by the GLA stated that 20% Londoners identify as Deaf and disabled.

¹⁹ You can see these on our website: [MPA: Issues - Equality and Diversity - Equality Impact Assessments](#)

70. In January 2007 it was decided that the Safer London Panel would no longer be funded by the MPA. This decision was based on the concern that the Panel was not value for money. The Panel ceased to exist in March 2007. Between January and March 2007 no further Panel activities were undertaken. The new EPU are considering what new pan London community engagement mechanism could be put in place or how the existing EPU mechanisms in the communities could be utilised to support this function.
71. The updated MPA DES action plan can be found in Appendix A to this report. Please note that the section pertaining to Professional Standards Unit is to follow. If you would like a further copy of the updated MPA DES action plan, please contact:

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Appendix B

Acronyms and abbreviations

ACPO	Association of Chief Police Officers
APA	Association of Police Authorities
BME	Black and Minority Ethnic
BOCU	Borough Operational Command Unit
BSL	British Sign Language
CDRP	Crime and Disorder Reduction Partnership
CEG	Community Engagement Group
CLAMS	MPA Committee Liaison And Members Service
CPCG	Community Police Consultative Group
CSB	Community Safety Board
DDA	Disability Discrimination Act
DES	Disability Equality Scheme
DIAG	Disability Independent Advisory Group
DVB	Domestic Violence Board
DVD	Digital Versatile Disc
EDU	Equality & Diversity Unit
EODB	Equal Opportunities and Diversity Board
EPU	Engagement & Partnership Unit
EqIAs	Equality Impact Assessments
ESfLG	Equality Standard for Local Government
GLA	Greater London Authority
GMB	British General Union
GNES	MPS Generic Equality Scheme
HAFAD	Hammersmith And Fulham Action on Disability
HR	Human Resources
IA	MPA Internal Audit
ICV	Independent Custody Visitors
MPA	Metropolitan Police Authority
MPS	Metropolitan Police Service
PCS	Public and Commercial Services Union
PCSO	Police Community Support Officer
PSU	Professional Standards Unit
RHCF	London-wide Race Hate Crime Forum
SMT	MPA Senior Management Team
TfL	Transport for London
YMCA	Young Men's Christian Association

Appendix C

Reference papers

1. 'Disabled people and the labour market in London: Key facts analysis of the 2005' Annual population survey, GLA, March 2005.
2. 'Access Audit Report' Centre for Accessible Environments, November 2007.
3. Remploy, www.remploy.co.uk, December 2006
4. GLA family group, www.london.gov.uk,
5. 'MPA Equal Opportunities Diversity Board (EODB) paper: A London Emergency Planning Seminar', MPA, September 2006
6. 'Counter Terrorism Debate: The London Debate', MPA planning submission: Andrew Hull, March 2006 (internal) / October 2006.