



Scrutiny of Metropolitan Police Service (MPS) Equality Impact Assessments

Recommendations:

- 1. Commissioning Brief template be amended to specifically request EIAs;**
- 2. An EIA Protocol be adopted to ensure effective scrutiny of MPS EIAs; and**
- 3. DARA to add scrutiny of MPS EIAs to audits.**

Introduction & Background

The Metropolitan Police Authority (MPA) has committed to ensuring a fair and responsive police service. 'Met Forward', the MPA's mission statement for London's police, set out three clear aims:

- to reduce crime and criminality;
- increase public confidence; and
- provide value for money.

In addition, under the Equality Act 2010 the MPA has a duty to ensure that it conducts its business in a way which promotes equality and eliminates discrimination.

A strong business case for the importance of equality and diversity to the MPA in meeting the three aims of Met Forward and complying with the Equality Act 2010 has already been made (MPA Equality & Diversity Business Case, October 2010). However, one of the ways we can monitor and scrutinise the MPS' work on equality and diversity is through Equality Impact Assessments (EIAs).

An EIA is a tool that helps organisations identify the potential impact of a policy or way of working on different groups of people. These groups might be based on age, disability, gender identity, race, religion or belief, sex or sexual orientation. EIAs help ensure that organisations do not discriminate or unintentionally disadvantage individuals while providing an opportunity to consider ways to promote equality.

EIAs are a major driver for practically and tangibly delivering an organisations commitment on equality and diversity, both morally and legally, and assisting organisations to realise the business benefits of equality.

Over the last year the MPA has worked hard to improve its own practices when conducting EIAs. This has included training for members and staff and a complete revision of the MPA EIA template and guidance.

It follows that the MPA should now turn its attention to improving the scrutiny and monitoring of MPS EIAs.

Benefits of EIAs

A strong MPA oversight of MPS EIAs will lead to benefits for the MPA, MPS and Londoners. These benefits include:

- ensuring that police services are accessible to all and serve the needs of London's diverse communities;
- improved deployment of MPS resources, financial and personnel, promoting efficiency savings;
- improved governance;
- the early identification of discrimination and methods for mitigating or avoiding this discrimination;
- encouragement of engagement and consultation in decision making;
- more informed decision making;
- identification of good practice;
- identification of areas for improvement;
- providing examples of an evidence-based approach to policy-making; *and*
- providing evidence of compliance with obligations under the Equality Act 2010, promoting equality and eliminating discrimination.

To help ensure these benefits are realised it is recommended that the MPA strengthens its oversight of MPS EIAs through an 'EIA Protocol' ensuring that MPS EIAs are requested, evaluated and logged.

In addition, this EIA Protocol should sit alongside a revised Commissioning Brief Template that explicitly requests reports to include an EIA.

Furthermore it is recommended that the MPA Directorate of Audit, Risk & Assurance (DARA) incorporate scrutiny of MPS EIAs into their audits.



Equality Impact Assessment (EIA) Protocol

This protocol is designed to enhance the consistency and quality with which the MPA holds the MPS to account for performance on equality and diversity issues. It is built on the foundation of the initial EIA training delivered to members and staff in early 2010 and is in effect a consolidation of our current EIA monitoring mechanisms.

Stage 1, Requesting EIAs

Policy Officers (report commissioners) should ensure all MPA commissioning briefs request the inclusion of an 'Equality & Diversity Implications' section within MPS reports and in particular include any appropriate EIA. To support this the MPA Commissioning Brief template has been updated to specifically request, where appropriate, an EIA with every MPS report.

The equality and diversity section of the report should include any issues identified, their associated risks and the key outcomes from any mitigating action. MPS authors should also be reminded that EIAs cover not just the internal employment aspect of new projects but also the external service delivery impacts to Londoners. MPS authors should structure this paragraph under the subheadings of EIA Issues, risks, Action to be taken and Evidence.

The EIA should address the basic questions that were introduced to staff and members at their EIA training. These are:

- The aim and outcome of the business case / plan / strategy
- Whether those outcomes would be different for different groups of people
- If any of those different outcomes would be adverse
- What could be done to mitigate the adverse outcome?
- What could be done to justify the adverse outcome and what evidence is there to support the decision made?

EIAs should specifically state the actions to be taken to mitigate the adverse outcomes identified and any evidence of the impact these actions have had.

Stage 2, Appraisal & Logging

Committee Officers should ensure upon receipt of MPS reports that an equality and diversity section has been completed and, where appropriate, an EIA with action plan is attached. Incomplete reports should be returned to the MPS for resubmission.

Policy Officers (report commissioners) should review the equality and diversity section of the report and any attached EIA; equality and diversity policy colleagues can provide further advice where needed. Issues arising should be incorporated into member briefings and raised in committee.

A log entry for each MPS EIA received should be completed by the Committee Officer. This log should include: the name of the policy being assessed, issues arising, actions taken and evidence of action impact.

Stage 3, Officer Quality Assurance

An MPA EIA Governance Group formed of Policy Officers who specialise in equality and diversity issues will conduct a dip sampling process of the EIA logs on a bi-monthly basis to assess the quality of EIAs and progress of the action plans; where necessary reports will be commissioned from the MPS to follow up on outstanding EIA issues.

Stage 4, Senior Management & Member Quality Assurance

Results of the dip sampling process will be reported to the Senior Management Team (SMT) and ultimately the Business Management Group (BMG) by way of quarterly bulletins. These updates will identify good practice and areas for improvement.

Stage 5, Review & Refresh

The EIA protocol will be reviewed on an annual basis to assess its performance and if the process is sufficiently robust or if amendments are needed.

Equality Impact Assessment (EIA) Protocol

