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**Metropolitan Police Authority**

**Composite MPA Equalities  
&  
Diversity Recommendations and actions  
2002 – 2005**

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## SUMMARY

The MPA Race Equality and Diversity strategy will form the baseline for the Authority's equality progress and performance for 2003 –2006.

The strategy document contains the priority areas, which the MPA will progress and on which regular reports will be presented to the EODB, MPA Service Management Team, Staff key partners and Stakeholders.

The annual report of the EODB will also reflect progress against the objectives and action plans which will be developed for all areas, where this is still to be achieved.

A key responsibility of the EODB will be to 'sign off the completion of the specified actions at a timescale to be agreed.

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## **MPA STATUS REPORT OF PROGRESS ON THE RES 2002/03 & RACE EQUALITY SCHEME**

The Metropolitan Police Authority Race Equality Scheme was published on 31 May 2002, to meet the statutory requirement of the Race Relations (Amendment) Act 2000 (RRA). The Scheme highlighted some of the unique challenges for the MPA, including that of monitoring and over viewing the progress of the Metropolitan Police Service, the largest police force in the UK and held in high regard internationally for its performance, policies and practices in equal opportunities, race and diversity. The MPS is very well resourced to deliver all its commitments and aspirations set out in its own Race Equality Scheme (RES) and its published Diversity Strategy document.

The MPA has a statutory duty to promote equal opportunities under the RRA, equalities and other related legislation. It not only has to ensure that its own performance is compliant with the Act, but must also overview, monitor and scrutinise the performance of the MPS in its compliance with the RRA . Indeed, success in delivering the Scheme, as measured by some of the performance indicators contained in the MPA's RES is dependent on the performance of the MPS, and other key stakeholders involved in the delivery of policing and community safety.

As a public authority, the MPA has devoted considerable energies to ensure that, organisationally, it has the structures and processes in place to deliver under its Scheme. The actions outlined in the Scheme demonstrate the way in which it has mainstreamed its equalities performance throughout its structures in order to meet specific requirements of the RRA.

The MPA Equal Opportunities and Diversity Board is the body established in order to meet the requirements of the RRA to provide strategic direction and inform the race, equalities and diversity policy development and practices of the MPA and MPS. The Board has overseen and continues to monitor the range of activities and initiatives that have contributed to the delivery of the MPA's Race Equality Scheme.

The progress outlined in this report also needs to be seen in context of the other equalities and diversity policies, reviews, recommendations and reports that have been taken forward by the Authority in the past year. These include:

- The implementation of the recommendations arising from the GLA Group Best Value 'Equalities for All' Best Value review, including the development on an equalities Service Improvement Plan (September 2002)
- Monitoring and overview of the MPS performance and practice in a number of equalities and diversity areas, including the scrutinising of the performance monitoring data on all equalities and the implementation of the diversity recommendations arising from Her Majesty's Inspectorate of Constabulary (HMIC) thematic report
- Scrutinies on stop and search, gun crime, rape investigation and Crime and Disorder Reduction Partnerships (2002 – current).
- Partnerships with media organisations to promote and contribute to crime reduction and increase public trust and confidence.
- The development and launch of a London-wide race Hate Crime Forum, in partnership with the key pan London criminal justice, statutory and voluntary agencies

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- An independent evaluation of the MPS Diversity/Community and Race Relations (CRR) Training (October 2002)
- Progress against the recommendations arising from the MPA Internal Audit review of the diversity applications of the MPA and MPS (December 2002)
- Detailed consideration and implementation issues arising from the Home Office 'Race and the Criminal Justice' report, which acted as one of the catalysts for the MPA scrutiny into the MPS performance and practice on stop and search (November 2002)
- The implementation, and monitoring of the implementation, of Recommendation 61 (police stops) of the Stephen Lawrence Inquiry report in the borough of Hackney (April 2003).
- The publication and wide circulation of the 'Know Your Rights' leaflets informing members of the public of their rights if they are stopped or stopped and searched by the police.
- Organisation of and contribution to a range of community events to engage with the public on policing matters as they influence public trust and confidence.
- Endorsement and full support of the MPS Gender Agenda initiative (October 2002)
- Progress with the implementation of the Disability Discrimination Act and participation in the Mayors office initiative to celebrate the Year of the disabled. (Feb 2003)

This first year annual report gives the opportunity for the Authority to demonstrate not only the progress that it has been made against the specific actions outlined in the RES but also against the many other initiatives noted above. As will be seen, significant progress has been made against the majority of the actions. But of course, there is always scope for further for improvement and the Authority will demonstrate its continuous progress in its next report in May 2004.

Since the publication of the RES, there have been structural, committee and personnel changes. There is therefore a need to update the Scheme and this will be completed in line with the requirements of the CRE by May 2005.

Copies of the Year One report can be requested in different community languages and other language formats. Please contact O'Cynthia Coleman, on the Consultation and Diversity Unit on 020 7202 0233, e-mail: o'cynthia.coleman@mpa.gov.uk if you require these. For further information on the MPA Race Equality Scheme, please contact Julia Smith, Head of Consultation and Diversity, on 020 7202 0226, e-mail julia.smith@mpa.gov.uk.

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**Year One summary report**

The Act requires that every public authority publish an annual report of progress against its scheme. Each action is aimed at meeting the General Duty of the Act, which is to:

- *Promote race equality*
- *Eliminate unlawful discrimination, and*
- *Promote good race relations.*

**MPA POLICIES**

<b>1. Action</b>	<b>Responsible Officer</b>	<b>1. Progress</b>
Reach an agreed set of equality principles	Head of CDO	Draft equalities values have been developed. MPA Members, officers, key partners and stakeholders will be consulted before the MPA Equal Opportunities and Diversity Board adopt these for publication. An internal equalities sub group of members and officers has been established to ensure organisational progress on all aspects of the scheme and to secure the embedding of equalities principles in all aspects of the MPA's performance as well as in its overview of the policies and practices of the MPS
Consider members' accountability to equal opportunities in Code of Conduct	Clerk/ CDO	The Standards Committee, with two independent members, polices the Code of Conduct, which covers the responsibility of members to respect the requirements of equal opportunities legislation and policies.
Brief members on equalities legislation	Head of CDO	Members have been kept informed, via papers to full Authority, Human Resources Committee and EODB, of the requirements of equal opportunities legislation. Consideration is now being given to the most appropriate form of follow-up training
Transfer existing Committee remit for Equalities to new governance structure.	Head of CDO/Secretariat	Completed. New structure in place to overview the Equalities Performance and consideration of each Committee. All MPA committees have equalities in their terms of reference. Reports on the equalities implications of all reports considered by all MPA committees are regularly considered by the EODB.
Develop diversity work programme and secure funding for it.	Head of CDO & Deputy Treasurer.	Completed. £280K permanently transferred from MPS budget to meet MPA specific requirements.. The EODB agreed an Equalities and Diversity budget and work programme for 2003/04 at its meeting on 26 September 2002.

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1. Action	Responsible Officer	1. Progress
Develop the link between Equalities objective setting and performance appraisals	Head of HR	<p>The MPA training for all staff in the performance management framework recognized that fairness was essential. Reporting and countersigning officers were trained to ensure that jobholders have equality of opportunity to achieve their full potential and that there was no discrimination when agreeing objectives and assessing performance. Reporting officers were trained to review the jobholders' performance regarding equal opportunities and diversity in the reporting year against:</p> <ul style="list-style-type: none"> <li>• The jobholder's equal opportunities developmental objectives; and</li> <li>• The MPA's equal opportunities statement and policies</li> </ul> <p>All staff are now expected to have an equal opportunities developmental objective. Reporting officers are now required to take account of the extent to which the jobholder has demonstrated the required standards of behaviour when assessing their performance regarding equal opportunities.</p> <p>When making the overall assessment and awarding the overall performance category, reporting officers are now required to assess the demonstration of equalities competencies. In doing this, they are required to take account of the jobholder's performance regarding equal opportunities. It has been made clear that jobholders should not be awarded the higher performance categories where it is clear that they have behaved in ways that contravene the MPA's values, equal opportunities policies or standards of behaviour. Processes are being developed and will be put in place to monitor action against this policy performance and reported to the MPA Internal Equalities Sub group and RES External Reference Group.</p>
Funding application forms for Community and Police Consultative Groups (CPCG) and Independent Custody Visiting Panels (ICVP) to include Equalities statement	Head of CDO	<p>A revised application form has been developed that will include an explicit equalities requirement against which CPCG applications for MPA funding will be assessed and monitored.</p> <p>The MPA has developed clear equalities performance indicators that will apply to CPCGs and ICVPs in its equalities Service Improvement Plan.</p>
Develop system for issuing Equal Opportunities statement with contract	Deputy Treasurer	Completed. Report considered and agreed by the EODB on 1 May 2003 proposing new Equalities and Diversity Statement be included within the Authority's contract regulations referring to the Authority's equalities objectives and the framework with respect to its

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1. Action	Responsible Officer	1. Progress
documents		application when initiating contract action. Statement reflected recent guidance from the CRE. Agreed by full Authority as part of overall Standing Orders on 26 June 2003. Internal group in place to monitor progress and in the process of preparing detailed operational guidance notes.
Establish baseline and monitoring system for key success factors	Senior Analyst	Work in progress to be agreed with external reference group. The MPA has also been working closely with Racial Equalities Councils to develop performance indicators that can be used to monitor the MPA and MPS performance on their RE Schemes at local levels. This will be completed by December 2003 and implemented by the end of the financial year.
Development of borough pan London community scrutiny and consultation on race issues	Head of CDO	<p>Completed year 1 progress includes</p> <ul style="list-style-type: none"> <li>• Rec 61 Monitoring Group in Hackney</li> <li>• Establishment of an external reference group to monitor and publicise to organisations and communities the MPA and MPS progress on its RES.</li> <li>• Work with local REC to monitor borough implementation of MPS RES</li> <li>• MPA Stop and Search Scrutiny</li> <li>• MPA Evaluation of MPS CRR Training</li> <li>• Local focus groups with youths in Hackney, Barnet, Lambeth etc.</li> </ul>
Introduce equalities implications in committee reports	Head of secretariat	Completed and being reviewed and updated to include assessment of impact to satisfy a core aspect of the RRA.
Committee Standard Compliance	Head of Secretariat	The EODB now regularly considers the equality implications of all committee reports by all MPA committees. The MPA Equalities officers also have responsibility for over viewing the equalities implications in all committee reports. A system for monitoring the equality performance of each committee has been proposed by the GLA as part of its equalities budget assessment of the MPA performance and this will be progressed in the current financial year.
Publish impact assessment reviews and results	Head of CDO	Progress is underway and by December 2003 all briefing and training sessions for MPA members and staff will be completed. Consultation on the completed impact assessments will be organised through the external reference group, Racial Equality Councils and other equalities groups and organisations. Completed IA reports will be published on the MPA

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1. Action	Responsible Officer	1. Progress
		website as these are undertaken and approved by the EODB.
Establish arrangements for communication in community languages	CDO /Director of Communications + other language forms MPA reports	Arrangements has been made with the MPS Translation Unit for translations into a wide range of community languages and other language formats to be made when these are required. This will ensure that the MPA will be able to produce reports and papers in a range of languages spoken by London's diverse communities. The MPA Stop and Search 'Know your Rights' leaflets have been printed in 13 different languages.
Area progress consultation strategy	Head of CDO	Completed. Consultation strategy completed and a copy can be accessed on the MPA website. The draft strategy has incorporated the RRA requirements and has identified the key equality groups that will be consulted by the MPA. Further revisions will outline the ways in which the MPA will consult on its impact assessments. There is need for a separate communications strategy to ensure that the Authority proactively communicates its progress on its Scheme to Londoners. This will be developed following detailed feedback from the external reference group and other key stakeholders and partners. The MPA is working to achieve the Level 5 local government equalities standard; this has a heavy emphasis on consultation and community engagement and will reinforce the requirements of the RRA.
Access and security requirements in MPA premises	Head of Administration	<p>The MPA premises have been assessed by Disabilities Advisers from the Metropolitan Police Service and the Royal National Institute of the Blind. The MPA offices are fully accessible to disabled members of the public. Parking spaces have been allocated for disabled drivers near an accessible entrance to the MPA office. Induction loop has been installed at all public meeting rooms</p> <p>Disabled toilets are provided and have the correct equipment including a flashing light on the fire alarm bell. Signs are clear and legible.</p> <p>The common areas of the building are the responsibility of the landlord, not the MPA and are currently not fully compliant with the DDA. The landlord has arrangements in hand for this to be addressed by next year.</p> <p>All staff have been inducted and briefed on the MPA security policy and where required, staff are provided with personal security alarms, especially where those who are community based or are required to work outside office hours. Managers are encouraged to see that arrangements are in place to secure the personal safety of their staff.</p>

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1. Action	Responsible Officer	1. Progress
Complaints policies and procedures set up	Head of Secretariat	Work completed and implementation in process. Policy available on MPA website.
Identify and agree common Equality Standards with GLA group	Head of CDO	This work is ongoing. The MPA attends regular meetings with the other members of the GLA group and progress is being made by the MPA and others to achieve common approaches and standards for the achievement of Level 5 of the local government equality standard by 2005. The MPA has also completed its equalities Service Improvement Plan that was one of the key recommendations arising from the GLA group "Equalities for All" Best Value review.
Ensure compliance with employment monitoring requirements	Head of HR	<p>The MPA has published annual reports monitoring MPA HR activities since November 2001. The most recent report was considered by the Human Resources Committee on 5 June 2003 and covered all the requirements of the RRA. The MPA has expanded its recruitment monitoring to cover all the ethnic origin categories within the most recent census and is in discussions with the recognised trade union about extending monitoring to include age, faith and sexual orientation.</p> <p>It is the intent to use the new categories for recruitment monitoring and to ask existing staff if they wished to complete the updated monitoring form. This latter request will be entirely optional and a matter of self-classification. The data will only be used for monitoring purposes.</p> <p>The MPA established a diversity recruitment task force to look into the recruitment of people from the black and minority ethnic community to increase the number of BME officers in the MPS. The MPA and MPS are also required to provide detailed information to the GLA as part of the annual budget setting process.</p> <p>The MPA Human Resource Committee monitors the employment policy and practices of the MPS on a regular basis.</p>
Carry out training needs analysis	Head of HR/CDO	<p>TNA has not been carried out due to the lack of data around individual requirements. One off and generic training or 'raising awareness' courses for all staff have been provided. All staff have been briefed on the requirements of the RRA and training sessions have been arranged to inform Members and officers on the completion of Equality Impact Assessments.</p> <p>An induction programme for new members, when the new Authority term begins in July 2004, is now being planned. This will include diversity training for all members, new and re-appointed.</p>

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**MPA FUNCTIONS**

<b>Established Function/Policy</b>	<b>Responsible Officer</b>	<b>Progress</b>
To publish a local policing plan, setting detailed objectives, performance targets and actions proposed by the MPA	Head of Planning/MPS Performance Planning and Review Committee.	<p>The 2003/4 policing plan includes three targets in relation to race hate crime:</p> <ul style="list-style-type: none"> <li>• To achieve a judicial disposal rate of 18% for racist crime</li> <li>• 70% of victims of racist crime are satisfied/ very satisfied with police performance.</li> <li>• To achieve a judicial disposal rate of 17% for homophobic crime.</li> </ul> <p>The 2002/3 policing plan included similar targets on race hate crime. Of the 4 related targets, two were achieved, and two were not achieved. At each of its meetings the PPR committee monitors the MPS performance against the policing plan targets, including race-hate crime. Joint work with the MPS is currently conducted on the satisfaction level of victims of racist crime, which was identified as an area of weakness earlier this year.</p> <p>The policing plan and performance monitoring reports are public documents available from the MPA web site.</p>
To work in partnership with local crime and disorder reduction partnerships	Deputy clerk/CoP	This area of work is under development. Under the Police Reform Act 2002, the MPA became a statutory partner on all 32 CDRPs from April 2003. On most of these the Authority will be represented by MPA members, supported by a specialist team of officers. Currently being recruited. Arrangements will need to be put in place to ensure that CDRPs are knowledgeable about the MPA RES and the specific performance measures outlined in the scheme. The MPA, in partnership with the GLA, Government Office for London, MPS and the Association for London Government (ALG) has already identified key areas for improvements on equalities issues by CDRPs. Progress will be monitored in the coming year.
To secure an adequate equalities budget for the Authority in order to meet internal and statutory requirements.	MPA Treasurer/Finance committee + EODB	This is an ongoing annual process and very much part of the overall budget process. The equalities budget is, of course, part of the overall wider budget for the whole of the MPA/MPS and the constraints/opportunities that present themselves for the wider budget obviously affect the equalities position. Processes are in place to ensure that where appropriate the need for growth in the budget is properly considered by the EODB and Finance Committees. In 2003/04 a growth in the Equalities budget was agreed in the sum of £280.000 and a work programme prepared to support this. In 2004/05 internal officer considerations, reflecting the

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Established Function/Policy	Responsible Officer	Progress
		assessment by the Head of CDO, of the need (if any) for growth has commenced. Officer recommendations would be considered by EODB at its October meeting. This would be supported by the Equalities Budget submission (considered by EODB in October) before submission to the GLA.
To work in partnership with the Mayor's Office, Greater London Assembly, Association of Police Authorities, Home Office and other key stakeholders and partners in working towards the elimination of discrimination, and the promotion of equal opportunities and good relations between different groups in matters relating to policing.	Head of Consultation and Diversity/EODB	<p>On going progress. The MPA continues to be involved in a range of partnership arrangements with its key stakeholders. In addition the Authority also works closely. Involvements have included: contribution to the</p> <ul style="list-style-type: none"> <li>• Annual Black History Month programme 2002;</li> <li>• Participation in the BME Cracking Crime conference and subsequent project development,</li> <li>• GLA Race Equality Working Group;</li> <li>• GLA group Equalities Network; Refugee Forum,</li> <li>• Domestic Violence working Group</li> <li>• Asian Affairs Sub Group,</li> <li>• HR Network</li> <li>• Procurement Network</li> <li>• Consultation Network etc. plus contact and involvement with a range of community and voluntary groups and organisation on policing, crime and community safety issues.</li> </ul> <p>The MPA, through its members and officers, is represented on a number of working groups, committees, including internal committees of the MPS, Home Office and other national organisations .</p>
To develop a complaints procedure and monitor this for accessibility to those who wish to pursue specific issues and complaints on policing practices and/or performance.	Head of Secretariat	<p>The MPA has published its complaints procedure and has integrated the requirements of the RRA. The current policy supports the general duty in the following ways:</p> <ul style="list-style-type: none"> <li>• third party reporting</li> <li>• the document can be made available in a variety of other languages, large print and Braille on request</li> <li>• complaints officers also offer to discuss the policy/procedure with anyone requiring further assistance</li> <li>• the policy is written in plain English and complaints officers use plain English in responding to complainants</li> <li>• the procedure is monitored through the use of a feedback form provided to each complainant, which asks for details of the complainants ethnicity and the ethnicity of the person the complaint is against is also recorded.</li> </ul> <p>More detailed work now needs to take place to inform the public about their rights to complain as outlined by the RRA..</p>

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Established Function/Policy	Responsible Officer	Progress
Secure organisational performance, management and culture.	Clerk and MPA Chair	Ongoing process. Team building/diversity awareness away day held in July for all Secretariat staff. A number of recommendations aimed at improving performance and establishing a mutually supportive culture now being actioned.
To demonstrate commitment to equalities and diversity.	Head of CDO/EODB	<p>This commitment is ongoing and is demonstrated in the strategic decisions that the Authority has taken; the active involvement of the Chair of the MPA, and other members in the promotion of key equalities performance as well as the condemnation of poor equalities practices.</p> <p>A recent Hay Job Evaluation review recently implemented by the MPA has highlighted the need to ensure that the commitment to equalities is fully demonstrated through all areas of the work activities of the Authority. This will also contribute to the Authority's success as it works towards the Level 5 equality standard.</p> <p>The need for regular staff audits of the MPA and MPS have been supported by MPA members and the MPA Internal Consultancy is currently undertaking a feasibility study of this.</p>
To consult with people who live and work in London on policing matters and in consultation with the Commissioner.	Head of CDO/Consultation Committee	Progress has been made in expanding the number of activities and methods by which the MPA and MPS consults with Londoners to ensure greater inclusiveness and representativeness. These include consultation with faith communities, the Asian community, partnership arrangements with youth organisations, e-consultation and progress to establish a citizen's panel.
To enable members of the public to feel confident in bringing sensitive and vexing policing issues to the attention of the Authority.	Clerk/Full Authority	An amendment to Standing Orders to facilitate public questions to the full Authority meetings was approved at the AGM in July. Performance measures for prompt and comprehensive responses to public correspondence are in place.
To develop an internal equal opportunities and diversity policy to demonstrate legal commitment, promote race equality values and	Head of CDO/EODB	Ongoing. Internal staff handbook policies on equalities and diversity published on intranet and to be reviewed by officer/member working group in the autumn.

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Established Function/Policy	Responsible Officer	Progress
diversity principles and practices to London's communities, stakeholders and partners.		
To set clear and practical performance measures and targets for monitoring MPA's race equality and equal opportunities performance.	Performance Analyst/ Performance monitoring committee	The EODB and the PPR committee jointly monitor the MPS and MPA performance on equal opportunities and diversity matters. A report providing management information on these issues is submitted at every other meeting of the EODB since Autumn 2002. This report includes detailed data on MPA staffing issues. Because the MPA has so few staff, trends change slowly and setting detailed targets on recruitment, retention and ranking structure with regard to diversity and equal opportunities issues may not be meaningful. This is under consideration. The Internal Consultancy Group at the MPS is undertaking some work towards a cultural audit of MPS and MPA staff.
Operational policing, community education, engagement, trust and confidence.	Head of policing policy/COP	The MPA has initiated and influenced the MPS operational performance on a range of areas that are likely to have direct impact on the public.
To set objectives for the policing of the Metropolitan Police District, consistent with the ministerial Priorities and in consultation with the Commissioner and Londoners.	Clerk / Authority	Achieved and incorporated in Policing Plan. The views of members of the BME and other equalities groups have informed the annual priorities through the consultation which the MPA carries out. The cycle of consultation now underway for the 2004/2005 priorities and a range of equalities groups, among others, will be contributing to this. Details of this consultation can be found on the MPA website.
To secure the budget for the MPS	Treasurer/Finance committee	This is an ongoing annual process, The equalities budget is part of the overall wider budget for the whole of the MPA/MPS and the constraints/opportunities that present themselves for the wider budget obviously affect the equalities position. Processes are in place to ensure that where appropriate the need for growth in the budget, if any, is properly considered by the EODB and Finance Committees. The process for

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Established Function/Policy	Responsible Officer	Progress
		determining the need to come forward with budget bids, at present rests within the MPS. Any growth would be reflected in the Equalities Submission agreed by the Finance Committee before presentation to the Mayor.
To require the Commissioner to submit reports on matters connected with the policing of London.	Clerk/Authority	Regular updates on operational policing issues to each monthly Authority meeting. In addition the Authority has commissioned a number of reports on specific issues over the year.

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## SUMMARY

The Best Value Review “Equalities for All” review aimed to

- Identify and develop the policies and strategies for Equalities for all to facilitate clarity of purpose and consistency within the GLA Group
- Improve Implementation and delivery across the GLA Group particularly working together and maximise the impact of the effort of each functional body on Equalities matters.
- Identify the existing management practice, identify gaps, identify and show best practice; and
- Develop a shared performance management approach to equalities including a core set of performance measures that can be monitored.

The outcome of the review was formally assessed by the Audit commission in July 2003-10-07 and as a result of the recommendations, the MPA has developed its service improvement plan.

The plan is relatively comprehensive and commits the Authority to a range of relatively high level commitments, including achieving Level 5 of the Local Government Equalities standards by 2005.

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## MPA EQUALITY BEST VALUE SERVICE IMPROVEMENT PLAN 2003

<u>ACTION/MEASURE</u>	<b>KEY INDICATORS</b>	<i>CURRENT POSITION</i>	<i>DIRECTORATE/POLICY LEAD</i>	<i>TIMESCALE</i>
<b>1. The GLA Group adopt a commonly shared vision in respect of equalities to ensure mainstreaming within the organisation.</b> <b>GLA Rec No 1,23,24,36</b>	1. Development and adoption of Equalities policy and strategy, reflecting the GLA Group Equalities vision. Outlined in BV equalities report.	<i>In progress. To be considered by EODB in October 2003.</i>	SMT/CDO Julia Smith	Dec 03
	2. Publication of joint MPA/MPS corporate equalities policy and statement in demonstration of responsibility under the Race Relations Amendment Act, equal opportunities legislation and European directives.	<i>In progress</i>	SMT/CDO Julia Smith SMT/Catherine Crawford	Dec 03
	3. Establishment of performance management systems, structures and processes to reflect and monitor the organisational commitment to equalities.	<i>No progress to date.</i>	SMT/communications Phillip Powell	Mar 04
	4. Adherence to the GLA Budget Equalities process to ensure that equalities is integrated into MPA/MPS strategic budget setting process.	<i>Some progress under the RRA requirements and plans underway to progress to level 5 of the local Government level 5 award.</i>	SMT/Catherine Crawford/CDO/Julia Smith	April 04
	5. Monitor and review all aspects of MPS equalities performance & policies + practices at policy + strategic level.	<i>Progress underway as above briefing for all staff, stakeholder etc to be fully detailed.</i>		Jan 04
<b>2. The GLA adopt six high level equalities categories for service and employment purposes</b> <b>[Gender, race, sexuality,</b>	2.1 Definitions and categories outlined in the review publications adopted and updated as further learning becomes apparent.	<i>work in progress</i>		
	Adoption of categories publicised	<i>work in progress</i>	CDO Tim Rees	March 04 March 04

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<u>ACTION/MEASURE</u>	<b>KEY INDICATORS</b>	<b>CURRENT POSITION</b>	<b>DIRECTORATE/POLICY LEAD</b>	<b>TIMESCALE</b>
<p><b>disability, age and faith]</b>  Group Recommendations  GLA 2, 14, 15</p>	<p><i>internally &amp; externally</i></p> <p><i>2.2 All major consultation and community engagement activities to reflect consideration of priority groups.</i></p> <p><i>2.3 MPA commitment and priorities to be publicised with key stakeholders partners.</i></p> <p><i>2.4 Annual funding allocation to community and police consultative groups to be assessed against performance in engaging the key priorities Groups.</i></p> <p><i>2.5 The performance of independent custody visiting panels be monitored against the priority groups.</i></p> <p><i>2.6 MPA Committee performance and work programmes to integrate performance of past qualities targets.</i></p> <p><i>2.7 Performance reports submitted to mayor's office and GLA ensure that all equalities targets are highlighted.</i></p> <p><i>2.8 Process for reviewing and updating equalities performance targets are regularly brought to the attention of the MPA EODB.</i></p> <p><i>2.9 Where appropriate and inline with</i></p>	<p><i>No action to date</i></p> <p><i>To be progressed</i></p> <p><i>Work in Progress</i></p> <p><i>No progress to date</i></p> <p><i>In progress</i></p> <p><i>On going progress</i></p> <p><i>No progress to date</i></p>	<p><i>Communications Phillip Powel CDO Tim Rees</i></p> <p><i>CDO Julia Smith</i></p> <p><i>Claire Lambet</i></p> <p><i>Performance monitoring Clair Lambet</i></p> <p><i>Performance monitoring Claire Lambet</i></p>	<p><i>March 04</i></p> <p><i>June 04</i></p> <p><i>Continuing and ongoing</i></p> <p><i>Dec 03</i></p> <p><i>Dec 03</i></p>

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<u>ACTION/MEASURE</u>	<b>KEY INDICATORS</b>	CURRENT POSITION	DIRECTORATE/POLICY LEAD	TIMESCALE
	the requirements of the RRA and level 5 equalities standards xxx reports are commissioned from the MPS on its function and services delivery in respect of the 6...			
<b>3. The MPA review and identify the appropriate target groups for its own as well as have an overview of the MPS target groups for its service delivery</b>	<p>The services and functions of the GLA Group address the multiple levels of discrimination experienced by socially excluded groups.</p> <p>Services and functions will be responsive, flexible and accessible.</p> <p>3.1 Key target groups for the MPA services to be identified primarily through the MPA consultation and community engagement activities.</p> <p>3.2 equalities Impact assessment to be carried out to assess for adverse impact on key groups and communities for all MPA key decision making.</p> <p>3.3 Monitoring and review processes be put in place to secure equalities impact assessment reports from the MPS Directorates on key policy decisions xxx service delivery.</p> <p>3.4 6 monthly report to equal opportunities and diversity board on key services and equalities impact assessments conducted by MPA + MPS.</p>	<p>Work in progress</p> <p>Work in progress</p> <p>New proposal. No progress to date.</p> <p>Work in progress</p>	<p>CDO Julia Smith</p> <p>CDO Julia Smith</p> <p>CDO Julia Smith</p> <p>CDO Julia Smith</p>	<p>September 2002 and ongoing</p> <p>Achieved 2002 To be reviewed annually</p> <p>On going 6 monthly reports to EODB March 04 December 03</p>

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<u><b>ACTION/MEASURE</b></u>	<b>KEY INDICATORS</b>	<b>CURRENT POSITION</b>	<b>DIRECTORATE/POLICY LEAD</b>	<b>TIMESCALE</b>
<p><b>4. The MPA commit to achieving Level 5 of the Equalities Standard by 31 March 2005</b></p>	<p>All the organisations striving to achieve exemplary status in respect of equalities</p> <p>4.1 The EODB confirms commitment to achieve this target.</p> <p>4.2 Clear objectives, timescales are put in place to work to achieve level 3 of the standard by summer 2004.</p> <p>4.3 All staff (MPA/MPS) briefed on requirements of the standard.</p> <p>4.4 Detailed and comprehensive independently assessed review be undertaken of all aspects of the MPA, performance and equalities policies, practices to identify the potential risks that could impede achievement of the level 5 standard by 2005.</p> <p>4.4 Progress all actions to achieve level 1 of the Equalities Standard (see 1,2)</p> <p>4.5 Progress all actions outlined in Equalities standards to develop supporting evidence to achieve level 2 of the standard on target setting action planning.</p> <p>4.6 All staff and members briefed on progress and targets to be achieved.</p> <p>4.7 Development and review of</p>	<p>Completed</p> <p>Work in progress</p> <p>To be progressed</p> <p>Work acknowledged as a priority and work underway to confirm this.</p> <p>Work in progress</p> <p>Some progress underway in work being done on budget equalities submission</p> <p>On going work in progress</p>	<p>SMT/CDO Julia Smith</p> <p>CDO/ Julia Smith</p> <p>CDO/Karina Horsham Maynard SMT/CDO Catherine Crawford and Julia Smith</p> <p>CDO/Julia Smith/Karina Horsham Maynard CDO/Julia Smith/Karina Horsham Maynard Communications unit Jacqui Jones</p> <p>IT manager Sudhen Swami. Performance and monitoring unit Claire Lambert SMT Catherine Crawford/Julia Smith</p>	<p>December 2002 July 2003</p> <p>September 2004</p> <p>December 2003</p> <p>October 2003</p> <p>Jan 2004</p> <p>June 2004</p> <p>December 2003</p>

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<u>ACTION/MEASURE</u>	<b>KEY INDICATORS</b>	<b>CURRENT POSITION</b>	<b>DIRECTORATE/POLICY LEAD</b>	<b>TIMESCALE</b>
	<p>communication strategy to keep staff and stakeholders informed of progress.</p> <p>4.8 Progress in all actions outlined in equalities standards to ensure achievement of level 3 on information systems and monitoring.</p> <p>4.9 Monitor and review of progress towards achieving level 5 standard by end 2005 and develop detailed action plan in EODB annual report 2004.</p> <p>4.10 Progress all actions and publish progress towards achieving level 5 of equalities standards</p> <p><b>4.11 The MPA agree to a programme of management and culture change and investigate their existing policies and legislation governing their services to identify and remedy issues that impede the mainstreaming of equalities apparent of level 5 achievement</b></p> <p>Work with other organisations to lobby for change, with the Mayor's involvement and support if necessary.</p> <p>4.12 MPA achieves a culture which works towards the eradication of discrimination and positively promotes equalities.</p>	<p>No progress to date</p> <p>Not progressed work to be commenced</p> <p>Not commenced, work to be progressed</p> <p>Some progress made Target to achieve level 3 by 2004 Will see major shift</p> <p>Some progress – major focus for level 3 achievement in next 12 months.</p>	<p>CDO/Julia Smith</p> <p>CDO/Julia Smith SMT Catherine Crawford.</p>	<p>Sept 04</p> <p>Dec 04</p> <p>Dec 05</p> <p>Sept 03</p> <p>Sept 2003</p>

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<u><b>ACTION/MEASURE</b></u>	<b>KEY INDICATORS</b>	<b>CURRENT POSITION</b>	<b>DIRECTORATE/POLICY LEAD</b>	<b>TIMESCALE</b>
<p><b>5. The MPA Group adopt the social model of disability</b></p>	<p><i>The GLA Group proactively supports and promotes the civil rights of disabled people.</i></p> <p><i>5.1 Proactive support and promotion of civil rights of disabled people.</i></p> <p><i>5.2 Representation of disabled people on core MPA committees (EODB or Consultation) to inform and influence policy decision making.</i></p> <p><i>5.3 Review and Publish commitment on adoption of social model of disability in line with other MPS and GLA group.</i></p> <p><i>5.3 Assess all policies and functions for adverse impact as core requirement of L5 Equality Standard.</i></p> <p><i>5.4 Monitor and review its own progress on implementing the requirements of the DDA on basic requirement to achieving level 5 standard.</i></p> <p><i>5.6 Increase the number of disabled employees in the MPA (and MPS) in line with the GLA Employment targets.</i></p>	<p><i>Model adopted by Authority</i></p> <p><i>Completed</i></p> <p><i>To be completed</i></p> <p><i>Some progress</i></p>	<p><i>CDO Jude Sequeira</i></p> <p><i>CDO Time Rees</i></p> <p><i>Communications Phillip Powel</i></p> <p><i>CDO Jude Sequeira</i></p> <p><i>HR Alan Johnson</i></p>	<p><i>December 2002</i></p> <p><i>2002</i></p> <p><i>July 2003</i></p> <p><i>Dec 03</i></p> <p><i>2005</i></p>
<p><b>6. A London Standard for Equalities be developed and promoted</b></p>	<p>The London Standard will address the gaps and flaws in the CRE/Equality Standard.</p>			<p>April 2004</p>

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<u>ACTION/MEASURE</u>	<b>KEY INDICATORS</b>	<b>CURRENT POSITION</b>	<b>DIRECTORATE/POLICY LEAD</b>	<b>TIMESCALE</b>
	<p>The Standard will be tailored to the needs of the GLA Group and the social demographics of London</p> <p>Leadership benchmark with equalities indicated produced and promoted by GLA Group</p>	No progress by GLA HR network. Standard will be achieved as part of level 5 achievement	HR/Alan Johnson as part of GLA Group HR network	Dec 2005
<p><b>7. The GLA Group adopt the definition of “Exemplary Employer”</b></p> <p><b>The MPA adopts and works towards being an ‘Exemplary Employer’ and implement the benchmark template to ensure continuous improvement demonstrated through a GLA Group HR network. (GLA 7,8,9,11)</b></p>	<p><i>All five organisations will be committed to developing policies, procedures and practice which are underpinned by the definition of an “Exemplary Employer”. This process will enable the group to realise its aspiration.</i></p> <p><i>7.1 MPA adopts the GLA Group definition of an Exemplary Employer.</i></p> <p><i>7.2 MPA Implement positive action initiatives that will assist members from the 6 priority groups to be better represented at senior management levels in the MPA.</i></p> <p><i>7.3 Review of suite of HR policies and procedures to ensure compliance and consistency with exemplary employer performance to contribute to level 2 equality standards.</i></p> <p><i>7.4 Staffing targets for MPA and Met and specific targets set for the MPS to achieve the Home Office ‘Dismantling Barriers’ targets.</i></p>	<p><i>Completed</i></p> <p><i>Principle agreed. Pilot to be implemented as part of GLA Group Action</i></p> <p><i>Work in progress</i></p> <p><i>Work in progress</i></p>	<p><i>HR Alan Johnson</i></p> <p><i>HR Alan Johnson</i></p> <p><i>HR Alan John</i></p> <p><i>HR Alan Johnson</i></p> <p><i>HR Alan Johnson</i></p>	<p><i>June 2002</i></p> <p><i>2002</i></p> <p><i>Jan2004</i></p> <p><i>May 2004</i></p> <p><i>Sept 2005</i></p> <p><i>Sept 2004</i></p>

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<u>ACTION/MEASURE</u>	<b>KEY INDICATORS</b>	CURRENT POSITION	DIRECTORATE/POLICY LEAD	TIMESCALE
	<p>7.5 Pilot alternative recruitment processes to achieve and maintain staffing targets in line with recent census data and London's population in MPA.</p> <p>7.6 Equalities performance is monitored as an integral aspect of staff performance appraisal + the results published in annual EODB report.</p> <p>Guidance and training to CPCGs, ICVPs and other groups and organisations allocated MPA funding to ensure that they are addressing the principles and practices of Authority as an exemplary employer.</p>	<p>No progress</p> <p>No progress</p> <p>No progress</p>	<p>HR Alan Johnson</p> <p>SMT</p> <p>CDO/HR</p>	<p>2004/05</p>
<p><b>8. The MPA adopt a GLA Group Exit interview process and framework. (GLA rec No12)</b></p>	<p>8.1 Systems framework in place for all staff leaving the organisation</p> <p>8.2 Annual analysis of the trends/patterns in order to inform the development of professional/managerial performance and structures.</p> <p>8.3 Systemic framework in place for monitoring the MPS analysis of its exit interviews for staff at all levels in the organisation.</p>		<p>HR Alan Johnson</p> <p>HR Alan Johnson</p> <p>HR Alan Johnson</p>	
<p><b>9. The MPA as part of the GLA Group research, analyse, report and disseminate</b></p>	<p>Open, transparent information sharing to become part of the GLA Group culture.</p>	<p>In progress</p>		<p>December 2002</p>

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<u><b>ACTION/MEASURE</b></u>	<b>KEY INDICATORS</b>	<b>CURRENT POSITION</b>	<b>DIRECTORATE/POLICY LEAD</b>	<b>TIMESCALE</b>
<p><b>information on services in a coordinated way [internally/externally]. The information should be produced in accessible formats for key equality target groups. (GLA Rec No13,27)</b></p>	<p>Annual budget equalities submission and GLA assessment report on information provided.</p> <p>GLA representation of MPA Equal opportunities + diversity board and other committees and working groups.</p> <p>MPA representation on numerous GLA group committees, working groups and involvement in strategic planning processes including Equalities Network</p> <p>The dissemination of key decisions and actions in accessible formats to key equality target groups.</p>	<p>Work in progress</p> <p>Work in progress</p>	<p>Treasury Ken Hunt</p> <p>SMT Catherine Crawford to coordinate/monitor outcomes Julia Smith</p> <p>MPA secretariat CDO to coordinate. Monitor outcome Julia Smith</p> <p>Communications Phillip Powell</p>	<p>October 03</p> <p>December 03</p> <p>December 04</p>
<p><b>10. The MPA undertake a review of existing methods of community liaison and make recommendations on how best to deliver a more joined up approach to community liaison including improvements in sharing information. (GLA Gp rec No10)</b></p>	<p>10.1 Information regarding the needs of equality groups to be shared with other GLA Group organisations.</p> <p>10.2 Establish network for community liaison/link officers to share knowledge and best practice.</p> <p>10.3 Undertake independent review to establish level of support and information required to ensure that CPCGs are equalities compliant and enabled to assist the authority in achieving its equalities targets with</p>	<p>Completed</p> <p>Completed. GLA consultation network in place</p>	<p>CDO/Tim Rees</p> <p>CDO Tim Rees</p>	<p>September 2002</p> <p>Sept 2003</p> <p>March 04</p>

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<u><b>ACTION/MEASURE</b></u>	<b>KEY INDICATORS</b>	<b>CURRENT POSITION</b>	<b>DIRECTORATE/POLICY LEAD</b>	<b>TIMESCALE</b>
	<p>community liaisons.</p> <p>Implementation of recommendation and learning from the GLA cracking crimes project in relation to CDRPs and their equalities performance.</p> <p>Annual monitoring and review of the service delivery performance of CPCGs to inform the MPA core service delivery performance.</p> <p>Undertaken RRA impact assessment of service provision and funding of CPCGs achievement to inform extent to which MPA is engaging with priority equality groups.</p>		<p>SMT/David Riddle</p> <p>Tim Rees/ Julia Smith</p>	<p>Feb 04</p> <p>Dec 03</p>
<p><b>11. The GLA Group undertake a review of the existing methods of conducting equalities impact assessments across the GLA Group and develop appropriate support and training for staff to ensure that the outcomes are implemented.</b> <b>(GLA Group re.c No 17)</b></p>	<p><i>11.1 Staff [engaged in managing/conducting equality impact assessments] are briefed and equipped to carry out equality impact assessments effectively</i></p> <p><i>Guidance information and MPA specific proforma developed.</i></p> <p><i>Year one progress on Re scheme published</i></p> <p><i>Internal monitoring process established to ensure continuous progress</i></p>	<p><i>In progress</i></p> <p><i>Completed</i></p> <p><i>In progress</i></p> <p><i>In progress</i></p>	<p><i>CDO Julia Smith</i></p> <p><i>CDO Julia Smith</i></p> <p><i>SMT /Catherine Crawford</i></p>	<p><i>September 2003</i></p>

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<u><b>ACTION/MEASURE</b></u>	<b>KEY INDICATORS</b>	<b>CURRENT POSITION</b>	<b>DIRECTORATE/POLICY LEAD</b>	<b>TIMESCALE</b>
	<p><i>Process established for ensuring all committees and MPA committee reports integrate equalities assessments.</i></p> <p><i>Progress key actions outlined in the scheme to assist achievement of level 5 equality award.</i></p>	<p><i>In progress,</i></p> <p><i>On going</i></p>	<p><i>CDO Julia Smith</i></p> <p><i>CDO Julia Smith</i></p>	
<b>12. Establish a Complaints and compliments procedure</b>	<p>Officers responsible for dealing with complaints are aware of equalities best practice.</p> <p>Review of MPA complaints guidance published in accessible formats and in different languages.</p> <p>People from the equality target groups are able to access the complaints procedures with ease.</p>	<p>Completed and ongoing review</p> <p>Completed and ongoing review</p> <p>In progress</p>	Clams/ Simon Vile	<p>September 2002</p> <p>December 2002</p>
<b>13. The MPA contribute to the review and strengthen of the terms of reference for the GLA Group Consultation Network [CN]</b>  (GLA Rec No 20)	The Consultation Network will have an overview of consultation exercises undertaken across the GLA Group – this will avoid duplication, ensure co ordination and sharing of information. The Network will also ensure that strategic development of consultation processes is properly informed by the perspectives of equality groups.	<p>Members of CN</p> <p>No action to date.</p>	CDO Tim Rees	September 2002
<b>14. The MPA contribute to and participate in the</b>	Working with the Equalities Commission will ensure that strategic equalities	This is a GLA initiated action and they are leading in coordinating	CDO Julia Smith	March2004

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<u>ACTION/MEASURE</u>	<b>KEY INDICATORS</b>	<b>CURRENT POSITION</b>	<b>DIRECTORATE/POLICY LEAD</b>	<b>TIMESCALE</b>
<p><b>reconstituted Equalities Commission.</b> <b>(GLA Rec No20)</b></p>	<p>developments across London are informed by a clear equalities perspective.</p> <p>The Commission can advise on policy development and play a key role in the monitoring and evaluation of equalities initiatives across the GLA Group.</p> <p>Guidance on the level 5 achievement and frameworks and processes put in place by the GLA group to ensure consistency across London.</p>	<p>this.</p> <p>Contributory and participant role</p>	<p>CDO/ Julia Smith EODB member when commission established.</p>	
<p><b>15. The GLA Group use the Equalities Commission to:</b></p> <ul style="list-style-type: none"> <li>• <b>Advise on the consultation undertaken and planned and advise on the impact on strategic planning;</b></li> <li>• <b>Play a role in reviewing consultation undertaken and assisting with the dissemination of the results of consultation;</b></li> <li>• <b>Advise on the performance of the GLA Group in respect of equalities issues.</b></li> </ul> <p>(GLA rec No 21)</p>	<p>The joint work of these two groups will ensure that work within the GLA Group is targeting the needs of equality groups across London. This will be enabled by the Equalities Commission as it is comprised of representatives from pan London equality target groups</p>	<p>No action to date. MPA Contributory role</p>	<p>CDO/ Julia Smith EODB Member when commission established</p>	<p>March 2004</p>

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<u><b>ACTION/MEASURE</b></u>	<b>KEY INDICATORS</b>	<b>CURRENT POSITION</b>	<b>DIRECTORATE/POLICY LEAD</b>	<b>TIMESCALE</b>
<b>16.. The “Equalities for All” Review recommends that the “Listening to Londoners” Review address some key issues</b>	The findings and recommendations from both reviews will be properly fed in to the structures and performance management systems of each organisation.	completed		March 2002
<b>17. The MPA Develops an Equalities use the communications strategy to ensure information flows through the different levels of each organisation to all MPA members, staff, stakeholders organisations &amp; partners and communities.</b>	<p>17.1 Equalities Communication Strategy is published &amp; publicised including indifferent language formats.</p> <p>17.2 Managers and all staff are made fully. staff are properly briefed on the requirements of anti discriminatory legislation and relevant codes of practice.</p> <p>17.3 Established process for monitor of the MPS internal and external communication strategy, especially to the six points groups.</p>	<p>Some progress made but need for focused target on 6 priority areas.</p> <p>Some progress through reports to EODB. Need for more refined reporting.</p>	<p>Communications/ Phillip Powel</p> <p>CDO/Julia Smith</p>	<p>December 2003</p> <p>Ongoing 2003</p>
<b>18. The MPA develop, in partnership with the functional bodies, a set of equality indicators to complement the corporate health indicators currently monitored and reported on.</b>	18.1 The GLA Group will monitor and report against a comprehensive set of targets.		Sally Palmer	December 2003
<b>19. The MPA adapt the CRE’s toolkit for auditing race</b>	19.1 Adapt and reproduce GLA toolkit for auditing race, gender and disabilities,	None to date	CDO Julia Smith	March 04

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<u><b>ACTION/MEASURE</b></u>	<b>KEY INDICATORS</b>	<b>CURRENT POSITION</b>	<b>DIRECTORATE/POLICY LEAD</b>	<b>TIMESCALE</b>
<b><i>equality to address the areas of race, gender and disability</i></b>	where this will assist with achievement of level 5 standards.			
<b><i>20. A procurement officers network should be established</i></b>	<p>20.1 Procurement officers able to address equality matters in a meaningful way through the procurement procedures.</p> <p>20.2 Equalities contract procurement procedure developed and being implemented.</p> <p>20.3 Staff briefed and provided with information</p> <p>20.4 Development of procedure for monitoring MPS implementation of procedure established and considered by EODB at least twice per year.</p>	<p>Completed and in progress</p> <p>Completed and being reviewed</p> <p>Under development</p> <p>In progress</p>	<p>Treasury /Deputy treasurer/ Ken Hunt</p> <p>Treasury /Deputy treasurer/ Ken Hunt</p> <p>Treasury /Deputy treasurer/ Ken Hunt</p> <p>Treasury /Deputy treasurer/ Ken Hunt</p>	To start in October 2002 - ongoing
<b><i>21. The Chief Executive of the MPA to be responsible for implementation of Service Improvement Plan</i></b>	Visible commitment of GLA Group to delivery on equalities issues.	Incorporated into Recommendation 1		

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# A GENERIC EQUALITY STANDARD FOR LOCAL GOVERNMENT

## **1. Introduction**

The Generic Equality Standard contained in this report has been developed under the joint guidance of the

- Employers Organisation for Local Government, the
- Commission for Racial Equality and the
- Equal Opportunities Commission, with contributions from the
- Disability Rights Commission and the
- Audit Commission.

It builds on the experience of the Commission for Racial Equality, which developed a Race Equality Standard for Local Government in 1995 and embraces the principle that 'quality means equality'.

## **2. A Framework for addressing anti discriminatory legal obligations**

The Standard provides a framework through which local government can address its legal obligations under anti-discrimination law (Sex Discrimination Act 1975, Race Relations Act 1976, Disability Discrimination Act 1995) which prohibits discrimination in the delivery of services and employment. In addition, it will help local authorities conform to the Race Relations Amendment Act which places a specific duty on all local authorities to promote racial equality and develop a comprehensive and systematic equalities practice as an integral part of the governments strategy for modernising local government.

## **3. An Active approach to address organizational anti-discriminatory practices**

The need for an active approach towards anti-discrimination is underlined by the findings of the Macpherson Report on the *Stephen Lawrence* enquiry, which highlighted the way that institutional discrimination can affect the way organizations operate and the way services are provided.

The report provides the following definition of institutional racism

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*“ The collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture and ethnic origin. It can be seen or detected in processes, attitudes and behaviour which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping which disadvantage minority ethnic people”* (Macpherson Report, 1999, para. 6.34)

The Standard is a means to combat the processes described in the Stephen Lawrence Enquiry Report that are part of the culture of administration and governance in Britain, which extends across other forms of discrimination, notably gender and disability.

#### **4. Central Government to Equalities performance and practice**

The government has committed itself through its modernising agenda to place equal opportunity at the ‘heart of the Government’s agenda’ and is committed to ‘*Eliminating unjustified discrimination wherever it exists and making equality of opportunity a reality for all.*’ (Home Office, 2000) To this end, the government is examining ways to harmonise and extend anti-discrimination legislation and strengthen the role of the equality commissions.

However, legislation alone will not bring about the changes necessary to eliminate discrimination. An approach is necessary, which will make comprehensive equalities practice an integral part of human resource and service planning and service delivery. In other words, equality must be a central feature of improving the quality of local government.

Already, local government is working with a number of programmes to improve quality through the modernising agenda;

- Best Value, the
- Beacon Council Scheme,
- Local Government Improvement Programme,
- New Deal for Communities.

The Generic Equality Standard provides a framework for integrating these initiatives with the council’s own equal opportunities policy to provide a systematic way of developing an anti-discriminatory approach to service delivery and employment. The approach will ensure that equalities are effectively mainstreamed across all departments and services.

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The Generic Standard will:

- **Provide a systematic framework for the mainstreaming of equalities**
- **Help local authorities to meet their obligations under the law**
- **Integrate equalities policies and objectives with Best Value**
- **Encourage the development of anti-discrimination practice appropriate to local circumstances?**
- **Provide a basis for tackling forms of institutionalised discrimination.**
- **Provide a framework for improving performance, over time.**

### **5. Local government and equalities**

Some Local Authorities have been at the forefront of developments in equal opportunity. Through the 1970's and 1980's many authorities developed a strong commitment to equal opportunity and pioneered changes, particularly in employment provision.

The re-orientation of local government over the last decade with its strong emphasis on customer satisfaction and service delivery should have made equality a central feature in the delivery of services. In practice, this has not happened because equal opportunity was not given sufficient priority in the work of local government.

For many local authority managers, equal opportunity is seen primarily as an employment issue focussing on recruitment, selection and training. This has meant that equal opportunity is still seen as the province of personnel or human resources managers rather than as an issue for the authority as a whole. An important feature of the Generic Equality Standard is to emphasise the importance of equalities practice not just in employment but also as an essential aspect of delivering quality services to the community. This approach is consistent with the Disability Discrimination Act, the Race Relations Act and with the developing commitment to consultation under Best Value.

### **6. Equality in service provision**

The argument for equality in service provision is fundamentally a matter of 'need'. Services should be available to all that need them. Realising this principle of fairness is not easy or straightforward because there is a range of, sometimes hidden, barriers to the access of services by particular individuals or groups. The objective of an equalities policy is to develop an understanding and awareness of those barriers and act to eliminate them.

Identifying the barriers that prevent access to services is not an easy process and it can only be achieved by working closely with service users and the local community. Service provision can discriminate against certain groups and may mean that they are

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denied basic services. The development of equalities within local government is part of a process, which can ensure that services meet local needs.

**Equality as quality**

A modern, high quality service recognises the diversity of its customers and can respond to their needs. Equalities strategy is about recognising diversity and acting to ensure fair treatment. It is important to provide 'appropriate' services which meet real needs rather than assuming that customers should fit with existing service provision. *Overall, it must be recognised that equality is a central feature of a modern quality service for local government.*

**An Equalities Standard**

The starting point for the Standard is the recognition that local government should provide a fair and equal service to all citizens. This principle of fairness is central to the Government's agenda to modernise local government and is embraced in the concept of 'Best Value', which lies at the heart of this agenda. At present, where equal opportunity is a key corporate objective, it will need to be broadened, and to be addressed at every stage of best value, including performance plans, reporting outcomes and in the contracting process where services are out-sourced.

The Standard has been designed to make equalities a corporate objective for all local authorities, thereby bringing equal opportunities directly within the framework for Best Value Performance Review.

As part of the improvement agenda for local government the Beacon Council Scheme has been established to identify councils that are performing well and help them spread good practice. Councils are selected on the basis of particular themes around which they are able to demonstrate 'good practice'. Although Beacon status is awarded to local authorities that demonstrate excellence in particular kinds of activity, there are general requirements of organisation and management, which include the management of equalities.

Community planning is seen as a key element in re-building the relationship between local citizens and local government. The importance of equal opportunities for the Community planning process is described in two ways. Firstly, in terms of Community involvement, the draft guidance describes the need for individual councils to devise techniques to 'best involve the different communities that make up their area.' The guidance goes on to say, *"The new duty to promote equal opportunities between people of different racial groups, which the Government is placing on all public sector bodies – and the commitment to introduce similar duties in respect of gender and people with disabilities, when*

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*parliamentary time permits – means that councils must ensure that the techniques they employ do not discriminate against particular groups – like the disabled and those in ethnic communities – can, inadvertently, be under-represented by the methods chosen to engage communities.”* (Preparing Community Strategies, DETR July 2000).

Equal opportunities will also be important in determining priorities. The guidance points out that “Where deprivation and social exclusion are significant factors for any community, the community strategy will need to address how these are to be tackled and how the quality of life of those in deprived communities is to be improved”. Ethnicity, gender and disability are important factors in shaping the conditions for social exclusion and therefore will form an important part of the community planning process.

The Government’s agenda for modernising local government has placed an increasing emphasis on equalities as a component of quality in local government. In a variety of ways the systems that have been established already signify the important role of equalities in employment and service delivery and these are underpinned by existing and proposed legislation.

The Equalities Standard has been designed to integrate with existing initiatives to provide local authorities with a consistent and systematic framework through which they can incorporate equality within all stages of the performance management process. While the Standard does not have statutory authority or an independent assessment process, its use by local authorities will be assessed through mechanisms established under the Government’s initiatives:

- Best Value Performance Plans
- Guidance on Best Value and Beacon Status
- Best Value Performance Indicators
- Scrutiny by the local community
- Community Planning
- Local Government Improvement Programme.

The development of these mechanisms in consultation with the DETR, The Audit Commission and the IDeA will ensure that the Standard will become a key component within the modernisation of local government.

## **Local authorities and anti-discrimination law**

There is now a considerable array of statutory backing for comprehensive equalities policies. The law, however, tends to tell local authorities what they must *not* do rather than giving positive guidance. Adoption and implementation of a Generic Equality Standard should, for example, help local authorities avoid recent penal compensation awards at employment tribunals.

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The Commissions have powers of law enforcement and policy development, which can be used to support the Standard. The power of formal investigation into unlawful activity has been used by the CRE as a way of enforcing change and this approach is available to the other Commissions. Local authorities make up 25% of the total of organisations investigated by the CRE over a twenty-five year period.

The national Commissions have also been active in formulating statutory Codes of Practice and Guidance to help inform organizations about what they should be doing. The Codes of Practice, although currently having no specific statutory force, have had increasing importance in tribunals and court cases.

The Race Relations (Amendment) Act 2000 has put much of what has up to now been advisory and voluntary onto a statutory/compulsory footing, thereby strengthening the legal requirement for local authorities to take action. The Government has stated its intention to bring the legislation on gender and disability in line with the changes to the RRA 1976 when parliamentary time permits.

A number of other pieces of legislation, which stress anti-discrimination, are also important. These are,

- the Children Act 1989 (placing a duty on local authorities in England and Wales to consider the racial and cultural needs of children looked after by the authority),
- the NHS and Community Care Act 1990 (which recognises that different ethnic groups have different care needs) and
- the Protection from Harassment Act (1997).

The adoption of European Human Rights legislation into U.K. law is likely to have a profound effect on employment rights and entitlement to public services and may extend powers to enforce anti-discrimination measures in these areas.

Overall, there are extensive legal powers to address discrimination and support the implementation of equalities within local government. Existing legislation and Codes of Practice are listed in **Appendix 2**.

## **Working with the Standard**

Following the principles adopted by the Government for the modernisation of local government, the Standard seeks to encourage a local response to local circumstances while securing an approach that will ensure a continuous improvement in equalities practice. To do this, a major objective for the Standard is the creation of a system within local government that will secure equalities as a corporate goal and ensure that equalities are considered as part of all aspects of work through and within local government. To do this, the Standard places considerable emphasis on the establishment of key processes within the local authority.

- Obtaining commitment from the council and from senior managers
- The establishment of a comprehensive equalities policy

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- Action Planning and target setting
- Information Systems and monitoring
- Measuring Progress against the targets
- Achieving real outcomes that meet equality objectives

Local authorities should use the Generic Standard to ensure that they address equality issues strategically and systematically. While local authorities differ greatly, the framework on which the Standard has been built recognises and takes account of:

- Wide differences in the range of services offered by local authorities depending on whether they are unitary councils or part of a two tier system
- Different levels of activity and experience in the field of equal opportunities
- Different equality issues raised by different local circumstances

Local authorities will be expected to demonstrate their level of achievement in establishing these processes through measured outcomes and the achievement of the authority as a whole will be assessed against the Standard. It is expected that within a local authority, services will adopt processes at different rates. **However, the overall assessment will be based on the progress of the whole authority and not individual services.** This approach is designed to promote a real corporate commitment to equalities.

In practical terms the Standard will integrate a cycle of activity within local authority management in which a comprehensive equalities policy will be used to establish equality objectives for each service. On the basis of these objectives, service areas will establish equalities targets. Achievement against these targets will be monitored and progress measured and evaluated. Ultimately, the authority should be able to demonstrate real progress in the achievement of its objectives. In reaching this final stage, however, the authority may find that it has to go through a number of cycles of

- objective setting,
- target setting,
- monitoring and
- measurement.

## DRAFT

Circumstances change and the aim of the Standard is to ensure that local authorities have an equalities system that can respond to change. Each stage of the process will require careful consideration to take account of local circumstances. Local authorities will be expected to demonstrate the reasons for their action at all stages. This will be an important element of the assessment process.

Although the Standard has been designed to bring equalities into the mainstream of policy making within local government, it is recognised that there will be certain targets and performance measures which should be a requirement for all local authorities. The Standard can adopt these national targets by requiring local authorities to include them as part their policy (at level 1) or as part of action planning (at level 2) or as part of information systems and monitoring (at level 3). In this way, the Standard can be easily adapted to take account of changing national requirements through the law or through the creation of equalities performance indicators. This approach also allows measures to be introduced, which will speed up the implementation of equalities policy when required. For instance, it will be possible through performance indicators to establish a timetable for the achievement of certain levels within the Standard.

**Working corporately in the management of equalities**

A corporate approach to the implementation of equalities is essential. This is recognised in the 'Best Value' process where equality is included as a corporate health indicator.

**Working in partnership – community leadership in equalities**

Increasingly, local authorities work through partnership arrangements in the delivery of a range of services and initiatives. Through its Community Leadership role local authorities should work to promote the Generic Equality Standard as a basis for partnership and would encourage partners to adopt the Standard as means of assessment in partnership programmes. The monitoring of partnership involvement with the Standard should be undertaken as part of the local authority's commitment to the Standard. Where partnerships are involved in the contracting out of work, local authorities should work within the regulations to ensure that contracts meet equal opportunity criteria and are effectively monitored.

**Working with existing quality and performance systems**

The Standard has been designed around the principles of quality management and can easily be adapted to work with existing quality management systems. Local authorities that have adopted EFQM or other TQM based models will find that the Standard can be located easily within these structures though it will be important to ensure that actions associated with equalities are effectively recorded within their systems. Other quality management systems should be integrated with the Standard to ensure that equalities are effectively mainstreamed within quality systems.

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**Extending equalities – beyond race, gender and disability**

The Standard provides a framework, which is easily extended to anti-discrimination policies for age, sexuality, class and religious beliefs.

These additional equality objectives would be driven through the self-assessment procedure and would effectively become part of the best value process.

**Working with the Standard – levels**

Although some of the tasks required by the Standard will be familiar to some local authority managers, for many, this will be unfamiliar ground. The aim of the Standard is to create a culture in which managers and staff will question and challenge assumptions about their services and re-assess them on the basis of equality and need. A brief outline of each level of activity is set out below as guidance. Further guidance on aspects of the Standard will be set out in supplementary documentation.

The Generic Standard has retained the principle of progress through a series of levels which was established in the CRE Standard for Local Government *Racial Equality Means Quality* (CRE 1995). The Standard is arranged as a series of stages, presented as levels 1-5. Local authorities can use the framework to help them systematically identify short, medium and long-term targets. The levels are intended to be used as a guide and the expectation is that targets relating to level 1 should be achieved before moving on to levels 2, then 3 and beyond. The broad issues addressed at each level are as follows:

- **Level 1** Obtaining commitment, establishing consultation frameworks, establishing policies and procedures
- **Level 2** Action planning, setting targets, implementing consultation frameworks
- **Level 3** Establishing and implementing monitoring and information systems
- **Level 4** Evaluating targets and measuring progress
- **Level 5** Clear outcomes demonstrating good equality practice

**Level 1: A Comprehensive equalities policy**

A comprehensive equalities policy involves a commitment to review and change local authority practice. This is considerably more than the production of a policy statement and should extend to the planning and initiation of a series of processes across the local authority and in partnerships with other groups and organisations. The Audit Commission defined a comprehensive equalities policy in their guidance to local authorities in 1996. Its specification contains the following components.

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- The authority's commitment to providing services fairly to all sections of the community;
- The types of action the authority intends to take or has taken to identify groups within the community whose needs are less well met by council services than those of other groups e.g. monitoring of service usage, audits of provision etc;
- The committees/sub-committees responsible for taking action to respond to the needs identified and for monitoring and effectiveness of such action;
- Monitoring the effectiveness of such actions e.g. target setting, surveys of users and non-users, local performance indicators;
- If not already covered above, the types of action the authority intends to take to ensure that it complies with its responsibilities under the Race Relations (amendment) Act 2000, outlined in its Scheme Action Plan, the Disability Discrimination Act 1976, the Disability Discrimination Act 1995 and the Sex Discrimination Act 1975; the Equal Pay Act 1970.
- The responsibilities of staff in relation to implementation of the policy
- (The Publication of Information Direction: Performance Indicators for the financial year 1999/2000, The Audit Commission, 1998, pp20).

**Although the Audit Commission makes no mention of employment in this specification, a comprehensive equalities policy would have to make equivalent commitments for employment. Out of the policy process should come a set of equality objectives defined both at corporate and service level. Taken together all these elements begin to make it clear what kind of action is necessary for a local authority to establish a modern equalities process.**

*Evidence*

- Corporate and service level policy documents detailing commitment to specific equalities objectives and rationale for each commitment
- Documentation of adoption of action plan for implementation of Standard with time-scales for each department
- Corporate and service objectives built into Best Value Performance Plans and individual service plans
- Corporate and service level arrangements for monitoring action plans

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**2: Target setting and action planning**

The key part of the equalities policy process is setting ambitious but realistic targets and planning action to implement those targets.

Specific targets will be developed from the more general equalities objectives. An authority will need to review both its employment/human resource and service delivery practices, and compare them with others of similar type. This will enable targets to be set that compare favorably with the performance of the best local authorities.

In order to conduct such a review, an initial population profile will need to be constructed, providing a regularly updated set of data with regard to gender, ethnicity and disability. The provision of this information will be an essential part of the 'best value' process. A 'needs' assessment should follow together with an assessment of how well those needs are currently being met. An authority should be in a position to estimate the impact of policy and spending changes on a wide range of groups. The next stage cannot take place until this basic information exists in a form that can be easily used by service departments.

Target setting and action planning depend on the 'needs' assessment but are not solely produced by it. Targets will be the outcome of reflection on an existing situation and making political choices about change. Targets need to be ambitious *and* realistic! Performance indicators will have to be adopted or developed for each target.

Action planning needs to take place in the context of resource assessment and judgements about what is possible. Many authorities will have been doing this data collection work consistently. All authorities, however, will need to review their data collection work and review its consistency with the current national Standards.

- *Targets for Service delivery*

An authority will have to review delivery of services within its area and target setting for equality should be seen as part of the 'best value' process. An important part of such a review will be consultation with relevant representative local groups.

- *Targets for Employment*

As a major employer an equalities leader in the locality, an authority will as a minimum need to see how its work force (and the way jobs are allocated within it) compares with the profile of the Local Labour Market Area.

**2.1.1.1 Evidence**

- Documentation relating needs and impact assessment to objectives, targets and action plans
- Target documentation that specifies performance indicators defining outputs/outcomes over specified time-frame
- Description of monitoring regime for each indicator with monitoring period

## DRAFT

- Action planning documents complete with costing over the decided time-frame
- Documentary evidence of consultation with relevant equalities groups
- Detail of management responsibility for implementation of action plans
- Documentation showing targets built into Best Value performance plans

***Level 3: Information systems and monitoring***

Information systems cannot simply be bolted onto the process of target setting. Equally, monitoring the effect of changes in service delivery should not be an afterthought. Target setting and action planning should have monitoring built in. Effective monitoring checks the progress made towards achieving specific targets and is not a generalised process of information collection. The process should begin with a community profile or audit which will establish a baseline for future monitoring. A monitoring programme is set up alongside (realistic) target setting and realistic action plans for achieving those targets and monitoring change against the baseline data.

*Evidence*

- Documentation giving details of monitoring for specific performance indicators
- Monitoring reports on each specified performance indicator
- Report to community in line with best value process

***Level 4: Measuring Progress***

Targets, action planning and monitoring, all have to take place within a well-defined time frame. Time limits need to be made explicit within the process of target setting and action planning (with documentation showing targets built into Best Value performance plans).

If it is clear during this process that targets are unrealistic or unachievable or that action plans are not clear, not working or facing opposition, the process will have to return to the target setting stage. This decision should not be deferred to stage 5 (with its temptation to redraw the criteria for success).

*Evidence*

- Documentary evidence of time-series monitoring reports on indicators
- Review of series of monitoring reports and consideration of progress
- Quantitative and qualitative consumer feedback

## DRAFT

***Level 5: Achieving Outcomes and Target/action plan review***

At stage 2 clear targets should have been set. Performance indicators will have been adopted or developed. Criteria will have been set that make it clear (with a reasonable degree of flexibility) what changes in the performance indicators represents meeting a particular target. The review process should work with these criteria to assess the success of action taken. At this stage a fundamental/critical review of all elements in the process should take place. This review should include members, officer and consultative groups. It may decide to change basic equalities objectives.

***Evidence***

- Systematic and critical report on action and target achievement (or not)
- Qualitative and quantitative feedback from consumers and consultative groups
- Analytical report of complete cycle of target setting, action planning and monitoring

**Assessing progress through the Standard**

Recent developments within local government have produced a number of related mechanisms for the development of performance management and the development of service quality. The case has been made that equality is a central component of quality provision in local government. It is therefore logical that the Standard should be seen as an integral part of the mechanisms for promoting quality within local government. Implementation of the Standard and the assessment of progress against the Standard will be linked closely with these existing processes.

**Best Value**

At level 1 of the Standard, local authorities will have established a corporate commitment to equalities which will ensure that equalities becomes part of the best value process for each service area. As a part of the best value performance reviews, equality objectives will be subject to the principle of the 4 'C's'

- Challenge Purpose
- Compare Performance
- Consult Community
- Compete with Others

The Action Plans from the Equalities Standard would be included in the local performance plan and would become part of the audit/inspection and certification process for best value.

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**Self- assessment**

An important feature of the Standard is the principle of self-assessment. Through action planning, monitoring and reflection on outcomes, the Standard embodies a process of self-assessment, which will provide a continuous loop back into the policy process. It is important that all stages of the self-assessment process are documented in order to maintain a continuing record of progress and the rationale for change in policy objectives. The records from the self-assessment process will form part of the external scrutiny process through audit, best value and through the local community.

**The audit process**

The audit process will provide the key point of assessment for progress through the levels of the Standard. Authorities will be required to produce documentation for all service areas to demonstrate their achievement against levels of the Standard.

Achievement of a level within the Standard will be based on an assessment of the whole authority.

Auditing will be a key instrument in setting specific national targets for equality to be included within local authority action plans. These targets will be established as Performance Indicators through the Audit Commission and will be evaluated as part of the annual audit.

**Community planning**

Consultation forms an essential element in the implementation of the Generic Equality Standard and will form an important element in objective and target setting. In order to set the context for this activity it is important that equalities are seen as a central feature of the Community Planning process.

Under the Local Government Act, all local authorities will be required to produce a community strategy '*for promoting and improving the economic and social and environmental well-being of their communities, and so contributing to the achievement of sustainable development in the UK*'.

The key elements of the community strategy emphasise: a 'community planning partnership'; development of a long-term vision and a focus on outcomes: assessment and monitoring of progress, for reassessing goals and priorities and for reporting back to the community. By integrating equalities strategy with community planning, the framework can be established for the development of equalities planning at a service level and for monitoring progress.

## DRAFT

**Scrutiny**

The principles of open government and scrutiny are set out in the Local Government Bill/Act and the formation of a scrutiny committee, in all local authorities, with a responsibility for equalities would be an important vehicle through which to implement the Standard. Alternatively, a leading member may be given the equalities portfolio which will raise the profile of equalities work and the Standard. Either way, a scrutiny system should be established which may involve councillors, voluntary organizations and community representatives to monitor performance.

**Independent Audit**

In general, the assessment procedures described above should be sufficient to ensure that the Standard delivers continuous improvement in equalities practice. There will be circumstances, however where these systems are insufficient to generate change.

This may be identified through the best value review process, through the community or through independent scrutiny. In these cases there may be the provision for an independent audit or peer review process developed to assess the local authority and make recommendations for compliance with the Standard.

**The Generic Equalities Standard**

The Generic Equalities Standard is set out below as series of tables. There are four specific areas of activity and achievement.

- **Leadership and Corporate Commitment**
- **Consultation and Community Development and Scrutiny**
- **Service Delivery and Customer Care**
- **Employment and Training**

Five levels of achievement are possible. Each level is an essential foundation for the next. The five levels of achievement and outcome are based around the five following key ideas:

- 1. Establishing a Comprehensive Equalities Policy**
- 2. Setting Equalities Objectives and Targets**

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- 3. Setting up Monitoring Systems**
- 4. Measuring Progress against Targets**
- 5. Achieving and Reviewing Outcomes**

## DRAFT

Level 1: Establishing A Comprehensive 2.1.2 Equalities Policy	Leadership and Corporate Commitment	Consultation and Community Development	Service Delivery and Customer Care and Scrutiny	Employment and Training
<ul style="list-style-type: none"> <li>• Declared commitment to <b>improve equalities practice</b> at both corporate and departmental level</li> <li>• Commitment to <b>developing equalities objectives and target setting</b> within all department and service areas</li> <li>• • Commitment to <b>systematic consultation</b></li> <li>• Commitment to <b>monitoring progress</b></li> <li>• Commitment to <b>audit and scrutiny</b></li> </ul>	<ul style="list-style-type: none"> <li>• Establish corporate commitment to the implementation of the Standard</li> <li>• Adopt comprehensive equalities policy for the authority</li> <li>• Bring all written policies into line with current legislation and codes of practice (Race Relations Act, SDA, DDA)</li> <li>• Adopt action plans for implementing the Standard with time-scales for each department</li> <li>• Create organisational structure for monitoring adopted plan</li> </ul>	<p>Publish draft corporate policy for consultation with staff and community in a range of languages and formats.</p> <ul style="list-style-type: none"> <li>• Incorporate equalities policy as a key theme within 'Community Strategy' for local authority</li> <li>• Consult departments/service areas on equality objectives.</li> <li>• Establish consultation machinery to assess needs, satisfaction with services and target review amongst users by ethnic minority, disability and gender</li> <li>• Establish mechanisms for responding to harassment on the grounds of race, disability or gender, racial attack and racial graffiti.</li> </ul>	<p>Demonstrate commitment to a comprehensive equalities policy in each department and service area</p> <ul style="list-style-type: none"> <li>• Develop clear objectives and implementation plans within the framework of the Corporate Equalities Plan, for each service area and department</li> <li>• Incorporate equality objectives within service plans</li> <li>• Audit policy and practice in the light of current objectives</li> <li>• Establish planning groups for monitoring systems</li> </ul>	<p>Adopt recruitment procedures which use non-discriminatory practices</p> <ul style="list-style-type: none"> <li>• Adopt procedures to ensure that publicity for vacancies does not unfairly restrict the range of applicants.</li> <li>• Produce a standard range of application forms and job descriptions that are clear and explicit.</li> <li>• Review personnel information system for monitoring suitability</li> <li>• Make procedures made consistent with Employment Codes of Practice</li> <li>• Establish that policies and procedures associated with equalities are part of grounds of race, disability or gender, racial attack and racial graffiti staff handbook and are understood by staff.</li> <li>• Training for all recruitment staff on the Equalities Standard, setting service objectives, action planning, monitoring</li> <li>• Build equalities objectives into management appraisal mechanisms</li> </ul>

## DRAFT

<b>Level 2: Setting Equalities objectives and targets</b>	<b>Leadership and Corporate Commitment</b>	<b>Consultation and Community Development and Scrutiny</b>	<b>Service Delivery and Customer Care</b>	<b>Employment and Training</b>
<p>To achieve <b>Level 2</b> of the Standard an authority will need to demonstrate that:</p> <ul style="list-style-type: none"> <li>• <b>an equalities action planning process</b> has been completed in which</li> <li>• <b>equalities objectives</b> developed at Level 1 have been translated into</li> <li>• <b>Action plans</b> and specific <b>targets</b> and these have been met through measured</li> <li>• <b>Performance indicators</b></li> </ul>	<ul style="list-style-type: none"> <li>• Set targets for service areas based on equality objectives</li> <li>• Complete action plans at service and departmental level incorporating Performance indicators</li> <li>• Adopt national targets/Performance Indicators as prescribed through Audit Commission</li> <li>• Establish systems for reviewing progress and revising action plans.</li> <li>• Members and Senior officers endorse action plans</li> <li>• Link Action planning to Best Value process</li> </ul>	<p>Make public action plans for consultation and scrutiny</p> <ul style="list-style-type: none"> <li>• Put in place appropriate translation and interpretation for consultation process</li> <li>• Fully consult service users on action plans</li> <li>• Consult on involving community and voluntary sector with scrutiny procedures</li> </ul>	<p>Establish action plans and targets within each department and service area; including the allocation of appropriate resources</p> <ul style="list-style-type: none"> <li>? Establish structures of responsibility at departmental and service level to progress action plans</li> <li>? Set timetable within action plans for creating/adapting information and monitoring systems within service areas</li> <li>? Provide appropriate language services to meet the needs of ethnic minorities and people with disability</li> <li>? Include within contracts a requirement to deliver an effective and appropriate service, fairly and without unlawful discrimination for agencies delivering services on behalf of the local authority.</li> </ul>	<p>Set employment equalities targets for recruitment and staff retention</p> <ul style="list-style-type: none"> <li>• Ensure that staff are aware of action plans and the implications for services</li> <li>• Provide information and appropriate training on action plans to support scrutiny process</li> <li>• Establish a system of guidance and training on relevant equality issues to shortlisting panels, interviewers.</li> <li>• Provide training for all staff on the detailed implementation of the Equalities Standard including action plans and updates on legal and other developments</li> </ul>

## DRAFT

<b>Level 3: Setting up monitoring systems</b>	<b>Leadership and Corporate Commitment</b>	<b>Consultation and Community Development and Scrutiny</b>	<b>Service Delivery and Customer Care</b>	<b>Employment and Training</b>
<p>To achieve <b>Level 3</b> of the Standard an authority will have to demonstrate that:</p> <ul style="list-style-type: none"> <li>• it has developed <b>information</b> and <b>monitoring systems</b> that allow it to assess progress in achieving targets</li> <li>• <b>monitoring reports</b> are being produced at specified intervals and circulated to all relevant review groups</li> </ul>	<ul style="list-style-type: none"> <li>• Establish corporate guidelines/prescriptions for information gathering and equalities monitoring.</li> <li>• Establish corporate information system to assess adequacy of departmental information and monitoring systems</li> <li>• Set up systems for examining impact of policies on groups according to disability, ethnicity and gender</li> </ul>	<ul style="list-style-type: none"> <li>• Consult with relevant community and interest groups about what kind of information will be collected and the reasons for it.</li> <li>• Establish a consultation process that demonstrably engages ethnic minority, gender equality and disability organisations</li> <li>• Review consultation process for improvement</li> </ul>	<ul style="list-style-type: none"> <li>• All service level units establish information systems and effective and adequate monitoring procedures</li> <li>• Use demographic and survey data to identify service needs according to disability, ethnicity and gender</li> </ul>	<ul style="list-style-type: none"> <li>• Set up or adapt personnel information systems to provide detailed reports relating to human resource targets (recruitment, promotion and retention)</li> <li>• Use equalities data to monitor use of grievance and associated procedures</li> <li>• Use equalities data to monitor the number of staff leaving employment and their reasons for leaving</li> </ul>

## DRAFT

<b>Level 4: Measuring Progress</b>	<b>Leadership and Corporate Commitment</b>	<b>Consultation and Community Development and Scrutiny</b>	<b>Service Delivery and Customer Care</b>	<b>Employment and Training</b>
<p>To achieve <b>Level 4</b> an authority will have to demonstrate that:</p> <p>? It is <b>measuring progress against targets</b> effectively using its information and monitoring systems</p> <p>? <b>Monitoring systems are providing useful information</b> about progress towards specific <b>targets</b></p>	<p>? Review targets against monitoring and produce reports for corporate team.</p> <p>? Prepare reports on progress against policy objectives for committee, scrutiny bodies and audit</p> <p>? Take on board community responses and scrutiny for revising policy objectives and targets</p>	<p>? Review by community and scrutiny bodies of progress against targets</p> <p>? Feed back response to monitoring to corporate and departmental teams, to directorate, council committees and members</p>	<p>? Use monitoring to assess achievements against targets set in action plans and feed back results into policy review, targeting and new action plans.</p> <p>? Report progress on action plans to directorate members, council committees, members and scrutiny groups.</p>	<p>? Use monitoring reports to assess whether authority employment profiles increasingly correspond more to profile of Local Labour Market Area in relevant respects?</p> <p>? Report progress on action plans to directorate members, council committees, members and scrutiny groups.</p>

## DRAFT

<b>Level 5: Achieving and Reviewing Outcomes</b>	<b>Leadership and Corporate Commitment</b>	<b>Consultation and Community Development and Scrutiny</b>	<b>Service Delivery and Customer Care</b>	<b>Employment and Training</b>
<p>To achieve <b>Level 5</b> of the Standard an authority will have to demonstrate that;</p> <ul style="list-style-type: none"> <li>• <b>Progress has been achieved</b> against the targets that it set at Level 2</li> <li>• <b>Review of targets, monitoring and consultation systems</b> has been carried out.</li> <li>• <b>New targets have been established with a rationale based on the review.</b></li> </ul>	<ul style="list-style-type: none"> <li>• Corporate assessment of success in meeting targets and for reviewing those targets for future action planning.</li> <li>• Corporate feedback and guidance on new round of action planning and target setting</li> <li>• Make commitment to set new/revised corporate and departmental targets</li> </ul>	<ul style="list-style-type: none"> <li>• Assess involvement and satisfaction of community and scrutiny bodies with progress</li> <li>• Review consultation with community and interest groups to assess how far they think targets have been met and were relevant to their needs and concerns.</li> <li>• Review empowerment consequences of progress against targets.</li> <li>• Assess change over target period in terms of continuing presence and composition of community and interest groups</li> </ul>	<ul style="list-style-type: none"> <li>• Demonstrate in achieving objectives and targets</li> <li>• Complete service level review of target achievement completed. Assessment of target relevance in terms of changing circumstances.</li> <li>• Benchmarking against other authorities in similar position</li> </ul>	<ul style="list-style-type: none"> <li>• Demonstrate movement towards employment equalities targets</li> <li>• Complete human resource assessment of equality target achievement</li> <li>• Complete assessment of target relevance in terms of full range of equality target achievement and changing circumstances</li> <li>• Authority can demonstrate that staff are fully trained in the systems for delivering full range of equality objectives</li> <li>• Managers at all levels can demonstrate that full range of equality objectives are mainstreamed as part of their professional practice</li> <li>• Benchmarking of full range of equality achievements against other authorities.</li> </ul>

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## **Appendix 1**

### **Race equality checklist**

The Generic Equality Standard translates into a race equality checklist consisting of the following questions. A positive response to any question will need to be supported by appropriate evidence. A negative answer should trigger action.

#### **Level 1: Establishing a comprehensive equalities policy**

##### **Leadership and corporate commitment**

- Does the Corporate Equalities Plan contain a specific commitment to pursuing race equality objectives?
- Is the policy consistent with the RRA 1976 and the RRAA 2000?
- Is the policy consistent with the Commission for Racial Equality's Codes of Practice?

##### **Consultation and community development and scrutiny**

- Are specific ethnic minority groups/representatives designated as part of consultation process?
- Has a system been set up to incorporate these groups into the consultation process?
- Have all departments/service areas have been consulted on race equality objectives?
- Has a mechanism been established for responding to racial abuse and racial attack and for dealing with racist graffiti?

##### **Service delivery and customer care**

- Is each department and service area committed to establishing race equality objectives?
- Within the framework of the Corporate Equalities Plan, has each service area and department has developed clear racial equality objectives for implementation in their area?
- Are race equality objectives incorporated within service plans?
- Has current practice been audited in the light of race equality objectives?
- Does planning for equalities monitoring include specific provision for race equality monitoring?

##### **Employment and training**

- Have all employment procedures been made consistent with the CRE Employment Code of Practice?
- Is the personnel information system been suitable for producing ethnic monitoring reports on recruitment, promotion and retention?
- Have procedures been adopted to ensure that publicity for vacancies does not restrict the range of applicants from ethnic minority groups?
- Has current race equality practice been audited in the light of current race equality objectives?

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- Are policies and procedures associated with racial equality included in the staff handbook and are understood by staff?
- Is there a comprehensive training plan that delivers differentiated training to staff at all levels?
- Have all senior managers received training on the race equality aspects of the Equalities Standard, setting service objectives, action planning and race equality monitoring?
- Are race equality objectives built into management appraisal mechanisms?

**Level 2: Setting equalities objectives and targets****Leadership and corporate commitment**

- Have targets been set for service areas based on specific race equality objectives?
- Have racial equality action plans been completed at service and departmental level incorporating performance indicators?
- Is action planning linked to Best Value process
- Have national targets for racial equality or Best Value equality performance indicators for racial equality been adopted?
- Have systems been established for reviewing progress and revising race equality action plans?
- Have members and senior officers endorsed race equality action plans?

**Consultation and community development and scrutiny**

- Have race equality action plans for consultation and scrutiny been made public?
- Are there appropriate translation and interpretation facilities in place for consultation?
- Have minority service users been fully consulted on action plans?
- Has consultation about involving minority groups with scrutiny procedures taken place?

**Service delivery and customer care**

- Have a race equality action plan and targets been set within each department and service area? Have resources been allocated for these plans?
- Have structures of responsibility at departmental and service level to progress race equality action plan?
- Is there a race equality action plan timetable for creating/adapting information and monitoring systems within service areas?
- Have appropriate language and translation services been provided to meet the needs of minorities at service delivery level?
- Do contracts with agencies delivering services on behalf of the local authority include a requirement to deliver an effective and appropriate service to all minority groups?

**Employment and training**

- Have race equality employment targets for recruitment and staff retention been set?

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- Are all staff are aware of the race equality action plan and its implications for services?
- Has Information and appropriate training on race equality action plan to support scrutiny process been provided?
- Has a system of guidance and training on race equality issues been established for shortlisting panels and interviewers?
- Has training been provided for all service managers on the detailed implementation of the race equality action plan and associated targets (including updates on legal and other developments)?

### **Level 3: Setting up monitoring systems**

#### **Leadership and corporate commitment**

- Have corporate guidelines/ prescriptions been established for information gathering and race equality monitoring?
- Is there a corporate information system that can assess the adequacy of departmental information and racial equality monitoring systems?
- Is there a system for examining impact of policies on ethnic minority groups?

#### **Consultation and community development and scrutiny**

- Has consultation has taken place with ethnic minority groups about what kind of information will be collected and the reasons for it?
- Has the consultation process has demonstrably engaged ethnic minority organisations?
- Has the consultation process has been reviewed for improvement?

#### **Service delivery and customer care**

- Have all service level units got information systems and race equality monitoring procedures in place?
- Are the procedures operating that are they sufficient for assessing progress in relation to their current specific targets?
- Demographic and survey data are being used to identify service needs according to disability, ethnicity and gender

#### **Employment and training**

- Is the personnel information system set-up/adapted for providing detailed reports relating to race equality targets (recruitment, retention, and progress)?
- Is race quality data is being used to monitor use of grievance and associated procedures?
- Is race equality data is being used to monitor the number of staff leaving employment and their reasons for leaving?

## DRAFT

**Level 4: Measuring Progress****Leadership and corporate commitment**

- Have race equality targets have been reviewed against monitoring and reports produced for corporate team?
- Has a report been prepared on progress against race equality objectives for committee, scrutiny bodies and audit?
- Have minority responses and scrutiny feedback been used in revising race equality policy objectives and targets?

**Consultation and community development and scrutiny**

- Have community and scrutiny bodies reviewed progress against race equality targets?
- Have responses to race equality monitoring reports have fed back to corporate and departmental teams, to directorate members, council committees and members?

**Service delivery and customer care**

- Have monitoring reports been used to assess achievements against targets set in race equality action plans and feed back into policy review, targeting and new action plans?
- Has progress on race equality action plans been reported to directorate members, council committees, members and scrutiny groups?

**Employment and training**

- Have race equality monitoring reports have used to assess whether authority employment profiles increasingly correspond to profile of LLMA in relevant respects?
- Has progress been reported on race equality action plans to directorate members, council committees, members and scrutiny groups?

**Level 5: Achieving and Reviewing Outcomes****Leadership and corporate commitment**

- Has corporate responsibility been established for organising / monitoring/providing guidelines for service level assessments of success in meeting race equality targets and for reviewing those targets for future action planning?

## DRAFT

- Has service level review of race equality targets been co-ordinated with assessments providing corporate feedback and guidance?
- Is there a commitment made to set new/revised corporate and departmental targets?

**Consultation and community development and scrutiny**

- Has involvement and satisfaction of minority community and scrutiny bodies with progress has been assessed?
- Has system for consultation with minority groups been reviewed to assess how far they think targets have been met and were relevant to their needs and concerns?
- Have the empowerment consequences of progress against targets completed been reviewed
- Has change over target period been assessed in terms of continuing presence and composition of minority groups

**Service delivery and customer care**

- Can progress be demonstrated against racial equality objectives and targets?
- Has a service level review of racial equality target achievement been completed?
- Has there been an assessment of racial equality targets against both achievements and changing circumstances?
- Has there been benchmarking of racial equality achievements against other authorities with similar minority populations?

**Employment and training**

- Can movement towards employment equalities targets be demonstrated?
- Has there been a human resource assessment of race equality target achievement?
- Has there been an assessment of target relevance in terms of racial equality target achievement and changing circumstances?
- Can the authority demonstrate that the staff is fully trained in the systems for delivering racial equality objectives?
- Can the managers at all levels demonstrate that race equality objectives are mainstreamed as part of their professional practice?
- Has there been benchmarking of racial equality achievements against other authorities with similar minority populations?

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## Gender equality checklist

### Level 1: Establishing a comprehensive equalities policy

#### Leadership and Corporate Commitment

- Is there support for equal opportunities at the highest level?
- Are resources specifically dedicated to implementing gender equality?
- Is there a written equal opportunities policy which covers gender, marital/family status and gender reassignment?
- Is the policy consistent with the Sex Discrimination Act and the Equal Pay Act?
- Is there a commitment to address multiple discrimination?

#### Consultation and community development and scrutiny

- Have the trade unions, staff association and/or employees been involved in the development of the equal opportunities policy?
- Have relevant user groups in the community been involved in the development of the equal opportunities policy?

#### Service delivery and customer care

- Is there a commitment to take action to promote equal opportunities and to redress any inequality and/or differential impact in all aspects of service delivery?
- Has a gender impact analysis been applied to areas of policy, such as land use planning, transport, economic development and housing, which can have a different impact on men and women?
- Is there a service delivery gender equality action plan?

#### Employment and training

- Are all employment policies and procedures consistent with the Sex Discrimination Act, the Equal Pay Act and the EOC Code of Practice on Equal Pay?
- Does achievement of equal opportunity objectives feature specifically in your managers' appraisal system?

### Level 2: Setting equalities objectives and targets

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**Leadership and corporate commitment**

- Have equality targets been set as an integral part of the equal opportunities policy and action programme?
- Are targets consistent with the Sex Discrimination Act?
- Is there specific reference to equal opportunities objectives in your corporate and management objectives?

**Consultation and community development and scrutiny**

- Have equality targets been set by agreement within the organisation and in consultation with trade unions, and other interested groups within the community?
- Have service users been consulted on the development of gender equality action plans?

**Service delivery and customer care**

- Are the different needs of men and women identified?
- Is there an action plan to ensure that services delivered are effectively targeted to meet the different needs of women and men?
- Has a service delivery, gender equality action plan been set within each department and service area?
- Have resources been allocated to these plans?

**Employment and training**

- Are there written recruitment and promotion procedures which specifically address the importance of avoiding gender discrimination?
- Is there a training programme which ensures that at every level women and men receive comparable on/and off-the-job training?
- Is there a contractual parental leave scheme which offers more than the statutory scheme?
- Are parental, family or adoptive leave, flexible working arrangements, childcare facilities and career breaks offered to female and male employees of all grades?
- Where appropriate, are you giving special encouragement to, and providing specific training for, the minority sex, as permitted by the Positive Action provisions of the Sex Discrimination Act?
- Are breaches of the equal opportunities and sexual harassment policies dealt with under the disciplinary procedures?
- Do disciplinary procedures specifically state that they must be applied fairly to both sexes?

## DRAFT

**Level 3: Setting up monitoring systems****Leadership and corporate commitment**

- Is implementation of the equal opportunities policy being monitored to identify any problems and to ensure that objectives are being achieved?
- Is there a system for assessing the impact of policies on women and men?

**Consultation and community development and scrutiny**

- Have local gender based groups been involved in setting up monitoring systems?
- Has the process included consultation with service users?
- Are contractors required to supply gender-disaggregated statistics for monitoring purposes?

**Service delivery and customer care**

- Is use of services monitored by gender?
- Are gender dis-aggregated statistics on service users collected for each department and service area?
- Are procedures for monitoring progress of action plan targets in place in each department and service area?

**Employment and training**

- Do you carry out an annual analysis or review of how many men and women you employ:
  - in total?
  - by grade and salary?
  - by hours of work?
  - by marital/family status?
- Do you monitor 'turnover' by gender and length of service of your workforce?
- Do you monitor your recruitment and promotion processes by gender and family status?
- Do you monitor grievance procedures by gender and family status?
- Do you monitor provision and take-up of training courses by gender and family status?
- Do you conduct a regular audit or review of the existing qualifications and training needs of your employees?

**Level 4: Measuring progress**

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**Leadership and corporate commitment**

- Is there an action plan for implementing the equal opportunities policy, with a timetable for implementation?
- Have all employees been trained in the implementation of the equal opportunities policy?
- Have you ensured that all employees are aware of their own responsibility in relation to the equal opportunities policy?
- Do you have procedures aimed at preventing sexual harassment and dealing with any allegations that arise?

**Consultation and community development and scrutiny**

- Do council committees, members and community groups receive regular progress reports which include gender- disaggregated statistics?

**Service delivery and customer care**

- Are all staff in service delivery directorates aware of the service delivery, gender equality action plan?
- Are mechanisms in place for regular progress reports to feed into policy development and future action plans?
- Has progress been benchmarked against other authorities?

**Employment and training**

- Have payment systems been reviewed for sex bias?
- Does the redundancy procedure specifically state that it must be applied fairly to both sexes?
- Is there a written, known and accessible grievance procedure which employees can use to pursue allegations of gender discrimination or unequal pay?

**Level 5: Achieving and reviewing outcomes****Leadership and Corporate Commitment**

- Has the equal opportunities policy been reviewed and/or updated in the last two years?
- Are action plans regularly updated?

**Consultation and community development and scrutiny**

- Have trade unions, staff association and/or employees been involved in reviewing the equal opportunities policy?
- Have relevant groups within the community been involved in reviewing the equal opportunities policy?

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**Service delivery and customer care**

- Are service users, contractors and organisations which come into contact with the authority aware of the equal opportunities policy, targets and action plan?

**Employment and training**

- Have positive action measures, as allowed under the provisions of ss47 and 48 of the SDA, been considered?
- Have you made sure that you are seen, both internally and externally, as an equal opportunities employer?
- Are Job Centres, Careers Advisers and Employment Agencies aware of your policy?

**Disability equality checklist**

The Generic Equalities Standard translates into a disability equality checklist consisting of the following questions. A positive response to any question will need to be supported by appropriate evidence. A negative answer should trigger action.

**Level 1: Establishing a comprehensive equalities policy****Leadership and corporate commitment**

- Does the Corporate Equalities Plan contain a specific commitment to pursuing disability equality objectives?
- Is the policy consistent with the Disability Discrimination Act 1995
- Is the policy consistent with the Disability Rights Commissions Codes of Practice?
- Is the policy available in different formats e.g. braille, tape and large print?
- Is progress on the Equalities Plan monitored in terms of its achievement for disabled service users, customers and employees?

**Consultation and community development and scrutiny**

- How are specific disability groups e.g. groups for and on behalf of disabled people, actively included in the consultation process.
- How have disabled employees been consulted on the contents of the policy and action plan?
- What system has been adopted to incorporate disabled people and disabled people's groups into the consultation process?
- What percentage of departments/service areas have been consulted on disability equality objectives?
- What mechanism has been established for identifying and responding to the harassment and victimisation of disabled people?

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- How are mechanisms for responding to harassment and victimisation of disabled people, communicated to disabled people?

**Service delivery and customer care**

- Is each department and service area committed to establishing disability equality objectives?
- Within the framework of the Corporate Equalities Plan, has each service area and department developed clear disability equality objectives for implementation in their area?
- Are disability equality objectives incorporated within service plans?
- Has current practice been audited in the light of disability equality objectives?
- Has service delivery provision been reviewed in light of Part III of the Disability Discrimination Act 1995
- Does planning for equalities monitoring include specific provision for disability equality monitoring

**Employment and training**

- Have all employment procedures been made consistent with the DRC'S Employment Codes of Practice?
- Is the personnel information system suitable for producing disability monitoring reports on recruitment, the provision of reasonable adjustments, training, development promotion, and retention?
- Have procedures been adopted to ensure that publicity for vacancies actively encourages disabled applicants?
- Have procedures been adopted to remove disabling barriers within the recruitment process?
- Has current disability equality practice been audited in the light of current disability equality objectives
- Are policies and procedures associated with disability equality included in the staff handbook, and understood by staff.
- Have all senior managers received training on the disability equality aspects of the Equalities Standard, setting service objectives, action planning and disability equality monitoring?
- Are disability equality objectives built into management appraisal mechanisms?
- Have potentially disabling barriers within performance management schemes been identified and removed?
- Have all frontline staff received training to enable them to meet the needs of disabled customers/service users?

**Level 2: Setting equalities objectives and targets****Leadership and corporate commitment**

- Have targets been set for service areas based on specific disability equality objectives?
- Have disability equality action plans been completed at a service and departmental level, incorporating performance indicators?
- How are disability objectives and action plans linked to the Best Value process?
- Have national targets for disability equality or Best Value equality performance indicators for disability equality been adopted?

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- Have systems been established for reviewing progress and revising disability equality action plans?
- Have members and senior officers endorsed disability equality action plans?

**Consultation and community development and scrutiny**

- Have disability equality action plans for consultation and scrutiny been made public?
- Are there appropriate translation and interpretation facilities in place for consultation with disabled people?
- Are there appropriate accessible buildings/facilities available for consultation with disabled people?
- What mechanisms have been adopted to ensure involvement of isolated or house-bound disabled people in the consultation process?
- How have disabled service users been consulted on action plans?
- Has consultation about involving disability groups within scrutiny procedures taken place?
- How have disability groups/service users been involved on Best Value consultation?

**Service delivery and customer care**

- Has a disability equality action plan and targets been set within each department and service area? Have resources been allocated for these plans?
- Have structures of responsibility at departmental and service level, been agreed, to progress disability equality action plans?
- Is there a disability equality action plan timetable for creating/adapting information and monitoring systems within service areas?
- Have appropriate language and translation services been provided to meet the needs of disabled people at a service delivery level?
- Do contracts with agencies delivering services on behalf of the local authority include a requirement to deliver an effective and appropriate service to all disabled people?

**Employment and training**

- Have disability equality employment targets for recruitment, development and staff retention, been set?
- Are all staff are aware of the disability equality action plan and its implications for them as employees and service providers?
- Has Information and appropriate training on the disability equality action plan to support scrutiny process been provided?
- Has a system of guidance and training on disability equality issues been established for shortlisting panels and interviewers?
- Has training been provided for all service managers on the detailed implementation of the disability equality action plan and associated targets (including updates on legal and other developments)?
- Has training been provided to enable disabled applicants access to the recruitment process

## DRAFT

**Level 3: Setting up monitoring systems****Leadership and corporate commitment**

- Have corporate guidelines/ prescriptions been established for information gathering and disability equality monitoring?
- Is there a corporate information system that can assess the adequacy of departmental disability information and disability equality monitoring systems?
- Is there a system for examining impact of all policies on disability groups?

**Consultation and community development and scrutiny**

- Has consultation taken place with disability groups and disabled service users/employees, about what kind of information will be collected, the reasons for it, and confidentiality issues?
- Has the consultation process demonstrably engaged disability organisations?
- Has the consultation process demonstrably engaged disabled service users/individuals (including isolated and housebound disabled people)
- Has the consultation process has been reviewed with disabled people for improvement?

**Service delivery and customer care**

- Have all service level units got accessible information systems and disability equality monitoring procedures in place?
- Are the procedures that are operating sufficient for assessing progress in relation to their current specific disability targets?
- Has demographic and survey data been used to identify service demands according to disability, ethnicity and gender?
- Do corporate and service complaints procedures enable the monitoring of disability-related complaints and compliments?

**Employment and training**

- Is the personnel information system set-up/adapted for providing detailed reports relating to disability equality targets (recruitment, reasonable adjustments, training, development, retention, and progression)?
- Is disability quality data being used to monitor use of grievance and associated procedures?
- Have capability procedures been reviewed to ensure compliance with Part II of the DDA?
- Is equality data being used to monitor the number of disabled staff leaving employment and their reasons for leaving?

## DRAFT

**Level 4: Measuring progress****Leadership and corporate commitment**

- Have disability equality targets have been reviewed against monitoring and reports produced for corporate team?
- Has a report been prepared on progress against disability equality objectives for committee, scrutiny bodies and audit?
- Have minority responses and scrutiny feedback been used in revising disability equality policy objectives and targets?

**Consultation and community development and scrutiny**

- Have community and scrutiny bodies reviewed progress against disability equality targets?
- Have responses to disability equality monitoring reports been fed back to corporate and departmental teams, to directorate members, council committees, members and disability employee networks?

**Service delivery and customer care**

- Have monitoring reports been used to assess achievements against targets set in disability equality action plans and feed back into policy review, targeting and new action plans?
- Has progress on disability equality action plans been reported to directorate members, council committees, members and scrutiny groups and employee networks?
- Have the outcomes on disability related customer complaints and compliments been used to inform disability equality actions and policy reviews?

**Employment and training**

- Have disability equality monitoring reports been used to respond to changes within the representation of disabled people within the workforce
- Have disability equality monitoring reports been used to assess whether authority employment profiles increasingly correspond to profile of LLMA in relevant respects?
- Has progress been reported on disability equality action plans to directorate members, council committees, members scrutiny groups and employee networks?

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**Level 5: Achieving and reviewing outcomes****Leadership and corporate commitment**

- Has corporate responsibility been established for organising / monitoring/providing guidelines for service level assessments of success in meeting disability equality targets and for reviewing those targets for future action planning?
- Has service level review of disability equality targets been co-ordinated with assessments providing corporate feedback and guidance?
- Is there a commitment made to set new/revised corporate and departmental targets?
- Has the organisation an understanding of why progress has not been/has been achieved?
- How has the organisation shared learning on progress/lack of progress with others?

**Consultation and community development and scrutiny**

- Has involvement and satisfaction of the disability community and scrutiny bodies with progress been assessed?
- Has the system for consultation with disability groups been reviewed to assess how far they think targets have been met and were relevant to their needs and concerns?
- Have the empowerment consequences of progress against targets completed, been reviewed?
- Has change over target period been assessed in terms of continuing presence and composition of disabled people?

**Service delivery and customer care**

- Can progress be demonstrated against disability equality objectives and targets?
- Has a service level review of disability equality target achievement been completed?
- Has there been an assessment of disability equality targets against both achievements and changing circumstances?
- Has there been benchmarking of disability equality achievements against other authorities with similar disability populations?

**Employment and training**

- Can progress on disability employment and training targets be demonstrated?
- Has there been a human resource assessment of disability equality target achievement?
- Has there been an assessment of target relevance in terms of disability equality target achievement and changing circumstances?
- Can action to address lack of progress on disability equality targets be evidenced?
- Can the authority demonstrate that the staff is fully trained in the systems for delivering disability equality objectives?

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- Can the managers at all levels demonstrate that disability equality objectives are mainstreamed as part of their professional practice?
- Has there been benchmarking of disability equality achievements against other authorities with similar disability populations?

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## Appendix 2 Legislation and Codes of Practice

### Current legislation

**Disability:** Disability Discrimination Act 1995; Disability Rights Commission Act 1999

**Gender:** Sex discrimination Act 1975 (amended 1986), Equal Pay Act 1975 (amended 1984)

**Race:** Race Relations Act 1976, Race Relations Amendment Bill (currently before Parliament)

### Current Codes of practice

#### ***Disability Rights Commission***

Code of Practice: the Elimination of Discrimination in the Field of Employment Against Disabled Persons or Persons who have had a Disability (1999)

Code of Practice: Duties of Trade Organisations to their members and applicants (1999)

Code of Practice: Rights of Access, Goods, Facilities, Services and Premises (1999)

Access to Goods, Facilities and Services: Regulatory Impact Assessment (1999)

Duty of Reasonable Adjustment on Trade Organisations to make Reasonable Adjustments: Regulatory Impact Assessment (1999)

#### ***Equal Opportunities Commission***

Code of Practice on Equal Pay (1985)

Most advice from the EOC has been issued as “Good Practice “ guidance

#### ***Commission for Racial Equality***

Code of Practice for the elimination of racial discrimination and the promotion of equality of opportunity in Employment (1984)

Code of Practice for the Elimination of Racial Discrimination in Education

England & Wales: (1989).

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## GLA RECOMMENDATIONS RE MPA AND MPS BUDGET SUBMISSION 2002/03

### 1. The Metropolitan Police Authority

Total staffing for the MPA is 67. Out of its total budgeted expenditure of £9m in 2003-04 £289k (3.2 per cent) was identified by MPA as equalities related expenditure. This is analysed as follows:

	£000
Equalities based staff costs	59
Training recruitment and other internal costs	55
Local diversity and race equality scrutiny	120
Other service delivery costs	55

In the 2001-02 budget and equalities process the importance of the MPA working on defining its scrutiny role of the MPS was noted. In the following year additional issues were the adequacy of staffing resources to complete what needed to be done and the lack of a strategic equalities framework.

#### 1.1 Organisation

- 1.1.1 At an Authority level the MPA has established a member-led Equal Opportunities and Diversity Board (EODB). An examination of the minutes of the Board show that it has been primarily focused on matters of current concern, and has not mapped out for itself a clear strategic role. For example, in September the Board planned to consider presentations and commission reports on Disability (March 03), HIV and Aids (May 03), LGBT and Gender (July 03) and Faith (Sept 03).
- 1.1.2 At an officer level the MPA since its inception has adopted a mainstreaming approach to equalities throughout the organisation. At the same time the MPA has employed a lead officer on equality and diversity who only spends an estimated 50 per cent of her time on these issues. The current work programme is probably unachievable within the current staffing complement.

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- 1.1.3 The combined effect of these developments has meant that the MPA does not have a coherent framework in respect of equalities work.
- 1.1.4 This lack of clarity was reflected in the MPA budget and equalities submission. Due to concerns about its quality, the MPA was asked to re submit but the new submission was no clearer and contained little additional information.
- 1.1.5 The establishment of the Equal Opportunities and Diversity Board is an opportunity to ensure that the Authority has a clear steer in terms of a strategic framework and directing the work of the MPS. However, it appears that this opportunity is being missed.
- 1.1.6 It is recommended that the EODB performs three roles:
- Providing strategic direction to the MPA and MPS on the development of equalities work.
  - Scrutiny of the progress made by the MPA and MPS in mainstreaming equalities (Performance Management)
  - Policy Development
- 1.1.7 **The various committees within the MPA (e.g. HR Committee, Professional Standards Committee) should report on a periodic basis to the EODB on the way in which equalities is being mainstreamed within that area of work. Clearly the reports will address the inter relationship with the MPS and the work being undertaken from an equalities perspective. The EODB, will in turn, provide strategic direction to the committees and present an overview of the development of the strategic framework to the full Authority.**
- 1.1.8 The MPA can only perform its scrutiny role effectively if it is working to a comprehensive and coherent strategic equalities framework. **The MPA should publish their Diversity Strategy, originally promised for March 2003, as soon as possible. This needs to incorporate the outcomes of the Equalities for All Review and the targets contained within the Race Equality Scheme.**

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- 1.1.9 **The production of a satisfactory budget and equalities submission within the 2004-05 budget guidance timetable should be prioritised by senior management.**
- 1.1.10 **MPA communications with GLA need to be improved and the GLA's offer of assistance in addressing common issues needs to be developed.**
- 1.1.11 **MPA relationships with MPS also need to be clarified. It is unclear how the MPA's strategic role impacts upon the MPS at an operational level. The MPA need access to materially increased resources to carry this forward, perhaps by appropriate secondments.**
- 1.1.12 **The MPA should consider setting up a formal officer led - committee where officers from the Diversity Directorate in the MPS should meet with MPA officers on a regular basis to discuss the relationship between the two organisations, the work undertaken and generate recommendations for their respective equalities boards. The officer committee would need its own equality action plan and would concentrate on how to monitor performance management and would make a substantive contribution to equality policy development.**
- 1.1.13 **MPA should consider ways of speeding up decision making and commissioning processes. (The evaluation of the CRR training course which is scheduled to be presented to the Authority in April/May 2003 was suggested to MPA during the first round of the budget and equalities process in December 2000).**

**Equality priorities and objectives**

- 1.1.14 The MPA submission articulates its priorities as those that have been recently identified by their Equal Opportunities and Diversity Board, a scrutiny into the operation of Stop and Search powers, and the implementation of recommendation s.61 of the Stephen Lawrence Inquiry report which recommends that stops be properly recorded by the Police. These are perfectly legitimate areas for priority but given the absence of a strategic framework to demonstrate where these fit the budget and equalities submission did not provide the sort of strategic overview that was necessary given the absence of a diversity strategy.

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- 1.1.15 An operational Service Improvement Plan needs to be developed showing how the MPA plan to implement the strategic *Equalities for All Review Service Improvement Plan*.
- 1.1.16 MPA need to provide strategic direction to ensure the satisfactory implementation of the MPS Race Equality Scheme. The organisation also needs to integrate their own scheme into their business and performance planning processes.
- 1.1.17 MPA need to demonstrate that they have ensured that the MPS have satisfactory arrangements in place for when MPS become subject to the Disability Discrimination Act. There was a need also to get ownership and understanding around fulfilling corporate objectives as well as legislative requirements.
- 1.1.18 The MPA should consider conducting an equal pay review in respect of both uniformed and civilian staff within the MPS.

**Exemplary employer**

- 1.1.19 The MPA has already achieved its substantive employment targets for women and black and minority ethnic people. The figures are as follows:

	<b>31/3/04</b>	31/3/03	<b>31/3/02</b>
	<b>Target</b>	Target	<b>Actual</b>
Percentage of black and minority ethnic staff	27	25	30
Percentage of women staff	52	40	40
Percentage of black and minority ethnic staff in top 5 per cent of earners		No targets	0
Percentage of women in top 5 per cent of earners		No targets	33
Percentage of women joiners	60	50	67
Percentage of black and minority ethnic joiners	35	27	17
Percentage of staff who are disabled	9	5	0

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- 1.1.20 The top 5 per cent targets are not appropriate for MPA as they cover only three people. The MPA have agreed to consider a wider analysis (for example an analysis of the top 3 pay grades) in future.

**Targeting and evaluating services to equality groups**

- 1.1.21 The MPA provided a table that listed their budget proposals. Most of their proposed expenditure for 2003-04 (£120k out of £175k) relates to support expenditure for borough level diversity and race equality scrutiny. This programme needs to be carried forward within a clearly defined strategic framework.
- 1.1.22 Earlier initiatives like the stop and search consultation were very well done, but in the absence of a coherent equalities framework, these examples of good practice are not sustained on a consistent basis. In terms of resource allocation, the emphasis appears to be directed primarily at black and minority ethnic communities.

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## 2. Metropolitan Police Service

Total staffing for the MPS is currently c40,600, of which some 28,500 are police officers. Its total budgeted expenditure for 2003-04 is £2,671m. The MPS identified £118.8m (4.4 per cent) of this as equalities related expenditure. This is analysed as follows:

	£m
Internal equalities based staff costs	5.4
Training, recruitment and other internal costs	4.3
Disability Access	1.8
Service delivery staff costs	85.4
Overheads and other service delivery costs	21.9

More details of this expenditure are shown in Appendix A.

In previous years of the budget and equalities process the progress the MPS had made in tackling hate crime and expanding its Community Safety teams had been recognised. The main problems recognised during this period had been the MPS need for culture change to allow its workforce to become adequately diversified. From the beginning of the process it has been suggested that the MPS adopt recruitment targets for women (now agreed) and targets for women and black and minority ethnic employees in senior positions. Concern has been expressed from an early stage about the MPS single point entry recruitment system where any alteration would need legislative change.

### 2.1 Organisation

- 2.1.1 The MPS currently has a directorate, the Diversity Directorate, dedicated to the delivery of the mainstreaming agenda, specialist units (for example the Community and Cultural Resource Unit) and significant expenditure on specialist equalities - related areas (like rape havens, for example). Commander Cressida Dick has overall strategic responsibility for the Diversity Directorate, which is one of five directorates which reports to Deputy Commissioner Ian Blair. (An edited version of the MPS senior structure chart is shown at the end of this section). The Human Resources Directorate complements the Diversity Directorate, given the critical importance to the MPS of achieving a diversified workforce. The

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Directorate is headed by Assistant Commissioner Bernard Hogan-Howe; the Director of Human Resources is Martin Tiplady.

- 2.1.2 The Deputy Commissioner also chairs the Diversity Strategy Board which is comprised of senior officers from the MPS, MPA Members and officers, the Policy Director for Equalities and Policing at the GLA, the CRE, staff associations and Independent Advisory Group representatives. The Board provides strategic leadership and a steer to the diversity agenda within the MPS. There is also a Diversity Strategy Forum, chaired by Commander Cressida Dick that is responsible for taking forward some of the work arising out of the Board meetings at an operational level.
- 2.1.3 The organisation has also established a Race Relations (Amendment) Act Steering Group to oversee the implementation of the MPS Race Equality Scheme. The membership of the Group includes MPA and MPS officers, representation from the CRE and the GLA.
- 2.1.4 The GLA recognises the very considerable progress made by the MPS in progressing the equalities agenda over the last three years; they remain concerned however that the sheer size and complexity of the MPS makes mainstreaming equalities outside the Diversity Directorate problematic. It will always be difficult to ensure good communication flow and a coherent strategic focus between the Diversity Directorate, the boroughs and the Human Resources Department. The danger remains that day-to-day actions and working cultures by the service are not changed at the borough level even if culture and practice is excellent in the specialist units and the Diversity Directorate.
- 2.1.5 The report on the MPA in the previous section has made the point that the MPA's relationships with the MPS needs clarification and recommended that the MPA should consider setting up a formal officer led committee where Diversity Directorate officers from the MPS meet on a regular basis to discuss the relationship between the two organisations, the work undertaken and generate recommendations for their respective equalities boards.
- 2.1.6 This approach would help the MPA to exercise their scrutiny function. It would be expected that the committee should develop a performance management approach defining relevant performance indicators for each area of the MPS' activities that are particularly concerned with equalities issues.

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**Equality priorities and objectives**

- 2.1.7 The MPS budget submission (2003-04) provides a good overview of priority issues in a very complex organisation; it also provides some targets. The submission received this year was a material improvement on that received in previous years where the overview of priorities was very poor. The MPS also provided a well-developed analysis of their implementation of the *Equalities for All Review Service Improvement Plan*.
- 2.1.8 Given its history and size, the problems faced by the MPS in mainstreaming equalities work are inevitably complex and far reaching; consequently, one of their major problems is ensuring local delivery on the equalities agenda. The central equalities targets need to be supported by an effective locally based performance and monitoring infrastructure, reinforced by the Equal Opportunities Diversity Board and by Deputy Commissioner Blair and linked to the budgeted operational devolution framework.

**Exemplary employer**

- 2.1.9 The MPS has had a long-standing target of 25 per cent of police officers from black and minority ethnic communities which came from the Home Office. The original date for this target to be achieved was 2009. They also have a target for the recruitment of women officers of 18 per cent. In addition it has other internal recruitment and employment targets which have been set after discussion with the MPA and GLA. Progress towards these targets are as follows.

	<b>31/3/04 Target</b>	<b>31/3/03 Target</b>	<b>Current Actual</b>	<b>31/3/02 Actual</b>	<b>31/3/01 Actual</b>
<b>Police</b>					
Percentage of black and minority ethnic staff	6.6	7.9	5.5	4.8	4.2
Percentage of women staff	18.0	17.0	16.7	16.1	15.8
Percentage of black and minority ethnic joiners	15.0	30.0	10.7	10.2	6.7
Percentage of women joiners	25.0	22.0	20.3	19.7	20.7

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<b>2.1.3 Black and minority ethnic officers- Inspector and above</b>	No targets	2.8			
<b>2.1.4 Women officers – inspector and above</b>	No targets	7.1			
<b>2.1.5 Civil Staff &amp; Traffic Wardens</b>					
Percentage of black and minority ethnic staff	21.0	-	19.0	18.0	15.0
Percentage of women staff	No targets		58.9	59.0	59.0
<b>2.1.6 Black and minority ethnic staff in Bands A &amp; B</b>	No targets		3.9		
<b>2.1.7 Women staff in bands A &amp; B</b>	No targets		23.8		
<b>2.1.8 PCSOs</b>					
Percentage of black and minority ethnic staff	25.0	25.0	38.3		
Percentage of women staff	26.0		27.2		
<b>Disabled Staff</b>					
Percentage of staff who are disabled-long term target 9 per cent	No Targets		0.7	0.7	

- 2.1.10 Clearly, despite some limited progress, the MPS is still facing a major problem in recruiting and retaining black and minority ethnic applicants. Comparatives based on 1991 census data suggests that although the MPS has more black and minority ethnic police officers than any other force, compared to its local black and minority ethnic population as a whole, it is less representative than any other force (source: *Police Service Strength*, Home Office RDS Dept 2002).
- 2.1.11 Although the statistics do show steady but slow progress, the MPS still has a problem in recruiting women police officers (WPOs). Again, comparative figures suggest that the MPS's record of employing women police officers is poor. Of the other 42 forces in England only 4 had a lower per cent of women police officers. Only two forces recruited a lower per cent of women officers in 2001-02. The average for WPOs

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for the rest of England excluding the Met was 18.4 per cent (source: *Police Service Strength*, Home Office RDS Dept 2002).

- 2.1.12 During 2002 the MPS started the recruitment of Police Community Support Officers, with the support of the Mayor. The results of this have been encouraging and black and minority ethnic staffing levels of 38 per cent have been achieved, against a target of 26 per cent. The MPS is attempting to identify the reason for this success to see if there are lessons to be learnt that can be applied to the main force recruitment.
- 2.1.13 The GLA is concerned that the MPS has recently reduced its 2003-04 target for recruiting black and minority ethnic officers from 30 per cent of officer recruitment to 15 per cent. This reduction is only acceptable if it is backed by a clear new medium term strategy underwritten by top-level commitment to its delivery by the Commissioner, his senior staff and the MPA. The MPS need to appreciate that the Mayor's continuing commitment to a major increase in police numbers is conditional on a much-improved delivery against diversity targets.
- 2.1.14 In order to address the under-achievement of the MPS in respect of these targets, the Mayor recommended that a Recruitment and Retention Task Force be established to develop a focussed and coherent strategy to address the issues in respect of the recruitment and retention of BME staff within the service. The MPS has responded by establishing a Task Force chaired by the MPA, with representatives from the GLA, to develop innovative approaches to the recruitment of black and minority ethnic staff.
- 2.1.15 **However the terms of reference of this group do not cover retention issues and the group has not therefore considered such issues. The original intention and one of the primary reasons for setting up the group was to consider both retention and recruitment. The Taskforce should expand its terms of reference to include issues relating to retention.**
- 2.1.16 The figures for staff at the top levels still suggest that there are real barriers to both women and black and minority ethnic staff, with consequent blocking or hindering of the promotion and career development of women and of black and minority ethnic staff. The comparison is as follows:

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	Percentage in whole workforce	Percentag e in top levels
<b>Black and minority ethnic staff</b>		
Police (inspector up)	5.5	2.8
Civil Staff (Bands A & B)	19	3.9
<b>Women</b>		
Police	16.7	7.1
Civil Staff	58.9	23.8

- 2.1.17 The above figures show that the percentage of women and of black and minority ethnic staff in top level employment is consistently well below their overall employment levels, with the most acute problem appearing to be the very low rate of appointment of black and minority ethnic staff to the top bands of the civil staff hierarchy, where the percentage of black and minority ethnic staff employed at bands A & B (3.9 per cent) is only one - fifth of the level achieved overall (19 per cent).
- 2.1.18 Unsurprisingly, the figures for promotions reinforce this picture. Less than 3 per cent of permanent promotions in the 6 months to 30 September 2002 went to black and minority ethnic officers and less than 7 per cent went to women officers. MPS statistics suggest that these figures reflect the proportions of women and black and minority ethnic applicants. This indicates that many women and black and minority ethnic officers are not applying for promotion. In addition figures indicate that after allowing for retirements and transfer to other police forces black and minority ethnic officers are approximately twice as likely to leave the force as white officers.
- 2.1.19 The existing positive action policies pursued by MPS, for example specific training courses for black female managers and the high potential development scheme, are not enough on their own. The MPS need to ensure the implementation of a rigorous and properly resourced equality action plan flowing from the Gender Agenda. Following the high profile launch of the Gender Agenda in September 2002 the MPS are developing a distinctive Gender Agenda Action Plan. This is expected to be completed in September 2003, and will need to be integrated into the MPS business planning process.

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- 2.1.20 Staff retention and promotion continues to provide a fundamental challenge to the MPS and the MPA's ability to effect major cultural change within the organisation. The current division of responsibility of the recruitment and retention initiatives between the Development and Organisation Improvement Team (DOIT) and Positive Action Team (PAT) appears to militate against the coherent and integrated approach that is essential for mainstreaming to be effective.
- 2.1.21 The problem of cultural barriers to women and to black and minority ethnic police officers needs to be continually addressed. Despite significant changes in action planning, recruitment methods and training and the very high level of commitment exhibited by senior managers to the equalities agenda it is clear (from the evidence of focus groups, informal complaints, and some employment tribunal cases) that women and black and minority ethnic police officers can still experience high levels of harassment and isolation.
- 2.1.22 A Disability Programme Board has been set up to establish exactly what needs to be done to ensure that the MPS comply with the requirements of the DDA. At the moment, disabled people are not considered for employment as police officers and the employment for disabled people within the Civil Staff is very low (0.7 per cent of the total). However the full introduction of DDA requirements needs significant culture change in both the officer and civilian parts of the force.

**Exemplary Employer recommendations**

- 2.1.23 **The MPS approach to these issues must be long term and strategic; the impression often given is of short-term expediency where particular subjects are pursued for a short time, then effectively allowed to lapse. The equalities agenda needs constant prioritisation by all the service's senior officers. This needs to be supported by the introduction of a range of appropriate targets to address any disparities and gaps in the workforce profile of the organisation.**
- 2.1.24 **The MPS must treat the meeting of recruitment targets for black and minority ethnic officers as a matter of the highest priority. The reduction of the joiners target for black and minority ethnic officers is only acceptable if it is backed by a clear new strategy underwritten by top level commitment to its delivery by the Commissioner, his senior staff and the MPA. This strategy must**

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**consider the advantages of a multi tier entry strategy in helping the MPS meet its recruitment targets.**

- 2.1.25 The MPS should establish a clear disability employment strategy, complemented by high- level leadership and appropriate targets.**
- 2.1.26 Within the police service, after adjusting the leaving data for retirements, women and black and minority ethnic officers are disproportionately more likely to leave the force. The MPS needs to research the reasons for this carefully and should introduce a rigorous system of exit interviews whose results are monitored and published, as recommended in the Best Value Review.**
- 2.1.27 The MPS should examine the evidence of a glass ceiling affecting both black and minority ethnic and women employees and officers. Targets should be established for both groups for the ranks of inspector up and for bands A & B civilian staff, together with appropriate positive action strategies.**
- 2.1.28 Although the equalities implications of the results of promotion panels are formally monitored promotion panel results should be considered as part of the performance appraisal of the relevant individual officers.**

#### **Targeting and evaluating services to equality groups**

- 2.1.29 The MPS targeted services amounted to over £107M and more explanation was requested from the service in the review meeting; subsequently, the Diversity Directorate Policing Plan has been received by the GLA. In addition, more detail was requested on the Safer Schools Partnership, Child Protection work and the Arrest Referral Scheme. Some of this detail has now been received, but there is a need for GLA to research more extensively the nature and effectiveness of these MPS programmes. The MPS need to develop appropriate targets and performance indicators so that they are able to demonstrate that these programmes offer not only value for money but also effective responses for delivering on the equalities agenda.**
- 2.1.30 The GLA continues to be concerned over the issue of stop and search. Following Operation Safer Streets the number of stop and searches carried out by the MPS has increased materially. In the 10 months to**

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January the number of stop and searches already exceeded the total of 2001-02. The figures are as follows:

	No of stop and searches			
	10 months to Jan 2003	%	12 months to March 2002	%
White people stopped	104,843	50.5	100,833	51.8
Black and minority ethnic people stopped	102,608	49.5	93,710	48.2
Total	207,451	100.0	194,543	100

- 2.1.31 These statistics show that black and minority ethnic people continue to be much more likely to be stop and searched and that the disproportion is growing. The 10 months to January 2003 indicate that the relevant search rates were 70 per 1000 for the black and minority ethnic population and 18 per 1000 for the white population, a disproportional ratio of 3.86, compared to 3.63 in 2001-02.
- 2.1.32 The arrest rate for the two groups was very similar (around 14 per cent). However without a more forensic analysis of the nature of the arrests and the consequent judicial disposal rates this statistic is not a reliable indicator of equity. The full implementation of s61 of the Stephen Lawrence enquiry is needed as an important step towards allowing the MPS to demonstrate equality in their service delivery. The Mayor has made this point to the MPA, the Commissioner and the Home Office in his submission in April 2002 to the Government's consultation on the Police and Criminal Evidence Act.
- 2.1.33 Since the GLA has been established the MPS has greatly strengthened and improved the way that it deals with hate crimes. The reported incidence of hate crimes shows an uneven pattern with racist and homophobic crimes reducing by c12 per cent in 2002-03 and a rise of 10 per cent in domestic violence and rape. (This rise may be due to a greater willingness to report such crime, rather than any real rise in their incidence.)
- 2.1.34 The judicial disposal rate for these crimes also shows year on year increases, as follows:

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	per cent judicial disposal rate		
	2003-04 Target	2002-03 Actual	2001-02
Domestic Violence	17	17.0	14.3
Rape	25	25.0	22.5
Racist crimes	18	18.6	16.5
Homophobic crimes	17	17.9	14.6

- 2.1.35** Recognising the MPS excellent recent achievements in combating hate crime, the Mayor has already indicated his dissatisfaction with the target of 17 per cent for domestic violence; the MPS should consider increasing the target for judicial disposal to 25 per cent. Best practice from other forces shows that this target is attainable. He has also indicated that he would like crimes carried out against people because of their disability to be adjudged a category of hate crime and properly monitored with appropriate targets.
- 2.1.36** The MPS has achieved considerable improvement during 2002-03 in increasing their judicial disposal rates for rape, racist and homophobic crimes. Given this improvement they should consider increasing their 2003-04 targets, all of which were actually achieved in 2002-03.

#### Other recommendations

- 2.1.37** The GLA and MPS need to agree a continuing communication and liaison programme that would build GLA understanding and maximise the value of the budget and equalities process. This programme should include a quarterly meeting which looks at progress of the MPS Service Improvement Plan, in addition to focussed meetings to discuss particular initiatives and programmes.

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**2.1.38** Given the increased activity that would result from these recommendations the MPS should consider formally allocating part of the time of a senior officer as their lead on all matters relating to the budget and equalities process.

**Appendix A: Equalities related budget expenditure 2003-04**

	<b>3.</b>	<b>Total</b>	<b>Equalities based staff costs</b>	<b>Training &amp; other internal</b>	<b>Service delivery costs</b>
		<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>
<b><u>MPA</u></b>					
Staff (diversity development officer and administrator)		59	59		
Policy clearing house review		10		10	
MPS diversity budget performance review		10		10	
Corporate health check and cultural climate survey		5		5	
Race hate crimes forum		20			20
Local diversity and race equality scrutiny		120			120
Publicity- translation and accessible formats		20		20	
Recommendations 61 and 63 of Lawrence report		10		10	
Respect festival		5			5
Black history month		15			15
Priority group initiatives		15			15
<b>Total</b>		<b>289</b>	<b>59</b>	<b>55</b>	<b>175</b>

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	<b>Total</b>	<b>Equalities based</b>	<b>Training and other</b>	<b>Service</b>
	<b>£000</b>	<b>staff costs</b>	<b>internal</b>	<b>delivery costs</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>
<b>MPS</b>				
<b>HR, recruitment and selection, training</b>				
Positive action team	931	931		
Employee tribunal and grievance unit	302	302		
Recruitment	1,307		1,307	
Corporate positive action	2,099	773	1,326	
<b>On costs</b>	528		528	
Diversity training strategy	244	244		
CRR training at training school	1,947	1,147	800	
<b>Associations and advice</b>				
Associations	265	69	196	
LGBT group	70		70	
Independent advisory group, disability advisers etc	177	64	113	
<b>Operational</b>				
Community service units	31,082			31,082
Liaison officers	856			856
Safer schools	3,534			3,534
Operation Trident	20,906			20,906
Child protection	32,388			32,388
Interpreters fees	7,773			7,773

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Reinvestigations team	4,915			4,915
Proactivity and intelligence team	3,193			3,193
Diversity directorate service delivery team	1,420			1,420
Hate crime publicity	250			250
Arrest referral scheme	951			951
Diversity directorate	1,764	1,764		
Property disability access improvements	1,812	118	1,694	
Press and publicity	80	80		
<b>Total (see note 1 below)</b>	<b>118,794</b>	<b>5,492</b>	<b>6,034</b>	<b>107,268</b>

**Note 1: MPS service delivery costs.**

Most of the MPS service delivery costs are staff costs. An analysis between staff and overheads of the MPAS service delivery costs is as follows:

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<b>Staff numbers</b>		<b>2003-04 budget</b>	
<b>(FTE)</b>	<b>Service</b>	<b>Staff</b>	<b>Overheads</b>
		<b>£000</b>	<b>£000</b>
534	Community safety units	25,044	6,038
11	Liaison officers	689	166
60	Safer schools partnership	2,905	628
315	Operation Trident	18,792	2,115
548	Child protection	29,955	2,434
0	Interpreters' fees		7,773
77	Diversity directorate - reinvestigations Team	4,094	821
52	Diversity directorate - proactivity and intelligence team	2,640	553
21	Diversity directorate - service delivery team	1,197	223
	Publicity campaigns - increasing the reporting of hate crime		250
1	Arrest referral scheme	60	891
<b>1,619</b>	<b>Total</b>	<b>85,376</b>	<b>21,892</b>

## Appendix B: Analysis of GLA group progress on implementing the Equalities for All Review

### Introduction

This analysis is based on the information received in the initial budget and equalities submission from each organisation, and subsequently revised for additional information received. The matrix sets out the principle actions for each of the key themes, drawn from the final report of Equalities for All, Best Value review and presents progress made by each of the Functional Bodies. Wherever possible the budget implications have been included. Information on the theme of Exemplary Employer has not been included here as it is detailed in the main body of the report.

Vision and Leadership		
<p>The recommended vision, which we have now adopted is shown below. We will be an Equalities Champion and Leader in promoting Equality, challenging and eradicating discrimination, providing responsive and accessible services for Londoners and ensuring our workforce reflects the diverse population of London.</p>	<p>In terms of living up to that vision we have agreed to:</p> <ul style="list-style-type: none"> <li>•Develop and promote a London Equalities Standard, over the medium term.</li> <li>•Commit to achieving level 5 of the Equalities Standard by 31 March 2005.</li> <li>•Adopt the social model of disability.</li> </ul>	<ul style="list-style-type: none"> <li>•Adopt six high-level equality categories of gender, race, disability, faith, sexuality and age.</li> </ul> <p>Each organisation will build on the six high-level categories to make sure that we tailor services to the appropriate target groups for our services. We will pay particular attention to the target groups where, in general terms, we have recognised disadvantage</p>

Functional body	Objective responses and actions	GLA analysis and comments	Budgeted expenditure
MPA	Equal Opportunities and Diversity Board	The creation of the Equal Opportunities and Diversity Board provides a strategic focus for	£59k staff costs

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Functional body	Objective responses and actions	GLA analysis and comments	Budgeted expenditure
MPA (cont)		<p>diversity matters and platform for scrutiny of the MPA and MPS. Membership is diverse and the board is supported by a policy development officer and administrator. For 2003-04 a coherent work programme has been devised. Details of the work programme are featured later in the table.</p> <p>This development demonstrates a growing confidence within the MPA to address equality and diversity issues.</p> <p>MPA needs to recognize and strengthen its strategic role to steer the work of MPS through scrutiny, performance management systems and policy development.</p>	
MPS	<p>Diversity Strategy Board Diversity Directorate Diversity Action Plan Equalities for All Review</p> <p>Commissioner's CRE leadership Challenge Corporate CRE leadership Challenge</p>	<p>The structure created to deliver the equalities agenda, creating a directorate dedicated to mainstreaming and a range of specialist units, headed by the Diversity Strategy Board for strategic direction, in theory appears appropriate. There is evidence of good practice in the specialist units and the Diversity Directorate but GLA's key concern is that in practice this has not influenced the service at borough level.</p> <p>There was evidence of a rolling programme of</p>	Total Diversity Directorate staff costs – management and strategic relationships £1.8m

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Functional body	Objective responses and actions	GLA analysis and comments	Budgeted expenditure
	<p>RR(A)A steering group &amp; Race Equality Scheme Policy Clearing House</p> <p>Gender Agenda</p> <p>Diversity Press Officer</p>	<p>seminars by the Commissioner on equality and diversity and regular public statements on the importance of diversity.</p> <p>RES was being operationalised and there was awareness of working across the GLA Group for a common approach impact assessment.</p> <p>2/3 of boroughs had implemented Borough Community Diversity strategy models but the creation of the Policy Clearing House had created a backlog of analysis of policies and functions</p> <p>The Gender Agenda is not yet incorporated into the Diversity Strategy and Action Plan and there is concern that the initiative appears to have lost momentum and therefore impact.</p> <p>On the whole the publicity and promotion campaigns have been effective.</p>	

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<b>Culture Change</b>		
We committed to holding a high-profile event to launch the findings and recommendations of this review where all leaders and senior managers in the GLA Group can publicly commit to the London equalities agenda.	We agree to a programme of change for our management and culture to investigate our existing policies and legislation governing our services to identify and resolve issues that affect how we put equal opportunities into the mainstream.	We will set up an equalities network which will <ul style="list-style-type: none"> <li>•Share experiences, information and good practice.</li> <li>•Co-ordinate initiatives.</li> <li>• Develop joint projects.</li> <li>•Influence and develop frameworks and toolkits within the organisation.</li> <li>•Share resources when appropriate.</li> </ul>

<b>Functional body</b>	<b>Objective, responses and actions</b>	<b>GLA analysis and comments</b>	<b>Budgeted Expenditure</b>
MPA	The Equal Opportunities and Diversity Board Work Programme has identified a number of initiatives to contribute to culture change: Annual Corporate equalities health check and cultural climate survey. Local diversity and race equality scrutiny.  Race Hate Crime forum. Publicity materials in community languages and accessible formats. Publicity material on Rec61 &63 McPherson report, Respect Festival,	The Board has developed a work programme that attempts to prioritise actions that contribute to culture change (some have been listed under performance management) with budget lines  Many of the initiatives require working in partnership with a range of organisations. There is concern that could delay action.	Policy Clearing House review £10k Corporate health check an cultural climate survey £5k Local diversity and race equality scrutiny £120k Race hate Crimes Forum £20k

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Functional body	Objective, responses and actions	GLA analysis and comments	Budgeted Expenditure
	<p>Black History Month and funding contribution to the event.  Diversity training review.  Diversity and equalities awareness training.  Committed expenditure for internal equality groups.  MPA membership of the GLA Group RES working Group.  Public commitment to EfA Review and recs.</p>	<p>Recognition that training needs to go beyond awareness- raising into effective implementation of equality and diversity actions but little evidence of how this is to be done.</p>	<p>Publicity- translation and accessible formats £20k  Recommendations 61 and 63 of Lawrence report £10k  Respect Festival £5k  Black History month £15k  MPS Diversity Budget Performance review £10k</p>
MPS	<p>Corporate Diversity Action Plan includes enacting the recommendations of the Stephen Lawrence Enquiry, CRE Leadership Challenges, Borough Diversity Action Plans (BOCU), Central Diversity Plans (COCU), Fairness Health Checks. The Diversity Training Strategy Unit and its programme of   CRR training to all staff</p>	<p>For each initiative GLA require more information on how they are being implemented and drilled down at local/borough level and methods of evaluation and dissemination of good practice.  Focus groups have been established on race, gender, disability, LGBT issues and links established with Diversity directorate.  More information required on the roll out of</p>	<p>CRR training costs £1.9m  Staff costs</p>

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<b>Functional body</b>	<b>Objective, responses and actions</b>	<b>GLA analysis and comments</b>	<b>Budgeted Expenditure</b>
		RR(A)A training and its evaluation.. Difficult to ascertain what proportion of training is going to other equality strands, preparation for the introduction of EU Directives. It is not evident how this is being mainstreamed.	£244k

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<b>Improving Services</b>		
<p>We will research, analyse, report and pass on information on services in a co-ordinated way. We need to produce the information in accessible formats for important equality target groups.</p> <p>We will review our functions and services to make sure that all equalities targets, in terms of delivering services are set with appropriate systems for monitoring them and reporting the results.</p>	<p>We will agree the main targets and groups we will include in performance reports which we send to the Mayor every three months.</p> <p>We will carry out a review of existing methods of community liaison and make recommendations on how best to deliver a more joined-up approach to community liaison including improvements in sharing information.</p>	<p>We will carry out a review of the methods we currently use for equalities impact assessments within each organisation, and develop a shared assessment framework together with appropriate training and support programmes.</p>

<b>Functional body</b>	<b>Objective, responses and actions</b>	<b>GLA analysis and comments</b>	<b>Budgeted Expenditure</b>
MPA	<p>Policy Clearing House.</p> <p>MPS diversity budget performance review.</p> <p>Race Hate crimes Forum.</p> <p>Local diversity and Race equality Scrutiny.</p> <p>Priority group initiatives.</p>	<p>)</p> <p>) Discussed under other headings.</p> <p>)</p> <p>An important approach to monitor race equality at borough level.</p> <p>MPA have some capacity to financially support initiatives for equality target groups.</p>	<p>Priority group initiatives £15k</p>
MPS	<p>Introduction of a range of strategic policy initiatives within the Diversity Directorate including:</p> <p>Policy &amp; project management of service</p>	<p>This work has been identified within the equalities budget process but further details on the Directorate's role and work in this is needed.</p>	<p>Diversity Directorate Service Delivery Team £1.4m</p>

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Functional body	Objective, responses and actions	GLA analysis and comments	Budgeted Expenditure
MPS (cont)	<p>improvements to minority groups. 24hr advice on diversity issues. Critical incident support. Support for independent advisory groups. Monitoring Diversity Strategy Action plan. Stop &amp; search policy &amp; monitoring. Expansion of disproportionality work. Monitoring of RES. Hate Crime Reinvestigations, proactivity and pan London Hate Crime intelligence. Support for CSU's and Family Liaison, publicity campaign to increase reporting of hate crime.</p> <p>Stop and Search.</p> <p>Rape Scrutiny and Havens. Community Safety Unit.</p>	<p>Similarly the nature of and remit for this work needs clarification.</p> <p>Very little information provided on monitoring and analysis, reporting mechanisms. Current crime figures show increase in black and minority ethnic stop and search but with declining numbers of searches leading to arrest. Little reference made to this in submission.</p> <p>Work programme and progress reports to explain expenditure</p>	<p>Liaison Officers £0.9m</p> <p>Reinvestigations Team £4.9m Proactivity &amp; Intelligence Team £3.2m Press Officers £62k Hate Crime Publicity £0.25m</p>

## DRAFT

Functional body	Objective, responses and actions	GLA analysis and comments	Budgeted Expenditure
MPS (cont)	<p>Operation Trident.</p> <p>Central and borough Child Protection Units.</p> <p>Safer Schools Project. Interpreters. Arrest Referral Scheme.</p> <p>Equalities related building work.</p>	<p>Clarity required in the organization and spend on Child Protection. GLA want more information on the action plan arising from the Climbie Inquiry particularly any race equality implications and issues.</p> <p>Further information is required on each of these initiatives in terms of how they are operationalised and the relationship and management arrangements with the Diversity Directorate.</p> <p>Limited information on disability matters had been provided particularly on the impact of the DDA at the time of submission.</p>	<p>Community Service Units     £31.1m</p> <p>Operation trident £20.9m</p> <p>Child Protection £32.4m</p> <p>Safer Schools £3.5m</p> <p>Interpreters Fees £7.8m</p> <p>Arrest Referral Scheme £0.95m</p> <p>Equalities access building work £1.8m</p>

## DRAFT

<b>Consultation</b>		
Review and strengthen the terms of reference for our consultation Network. Reform the Equalities Commission after reviewing their membership and terms of reference.	Use the Equalities Commission, which will include representatives from equality groups throughout London, to do the following: •Advise on actual and planned consultation and advise on the effect on strategic planning.	<ul style="list-style-type: none"> <li>•Play a role in reviewing the consultation carried out and help pass on the results of consultation.</li> <li>•Advise on our performance in terms of equalities issues.</li> <li>•We have also fed a number of recommendations to do with good practice into the 'Listening to Londoners' best value review.</li> </ul>
<b>Functional body</b>	<b>Objective, responses and actions</b>	<b>GLA analysis and comments</b>
MPA	Local diversity and race equality scrutiny.	<p>This is planned to be a systematic way of monitoring effectiveness of race equality at borough level. Meetings with local groups provide direct feedback.</p> <p>However no evidence provided of other consultation to influence strategy or operations although are aware of a study in Hackney, Kensington and Chelsea and Greenwich.</p>
MPS	<p>Creation of Independent Advisory Groups, advising on policy, strategic and tactical decisions.</p> <p>Liaison officers for "hard to hear" communities</p>	<p>GLA have queried the role and need for such groups in addition to a number of different arrangements from borough –based groups, strategic and pan-London consultation groups now the MPA is established.</p> <p>It is not clear how this initiative fits within the structure for consultation</p>

## DRAFT

<b>Performance Management</b>		
<p>We will develop a set of measures for employment and delivering services to go alongside the measures for corporate health currently monitored and reported on. These tackle a wide range of activities, for example, a breakdown of women and black staff in line with salary bands – both within the upper and lower tiers of the workforce. We will adapt the CRE 's toolkit for auditing race equality, as a way of measuring overall performance against race, gender and disability.</p> <p>We will also assess the level we reach on the equality standard in each organisation.</p>	<p>We will set up a procurement officers ' network to provide guidance on current legislative requirements and develop common methods of approval and monitoring. We will adopt this framework across the whole group. We will co-ordinate the work of the Data Management and Analysis Group DMAG, the Policy Support Unit and the Economics Team to make sure that we update and pass on information relating to our equality target groups regularly.</p>	<p>We will promote and promulgate widely within the group, the information available on equality target groups.</p> <p>The LDA has agreed to develop strategies for:</p> <ul style="list-style-type: none"> <li>•Developing small firms who find it difficult to keep to our Procurement frameworks; and developing awareness of equal opportunities with large firms who need help in placing it in the mainstream of equalities agenda.</li> </ul> <p>We will develop the process of linking equal opportunities issues to the budgets and business plans of the group, ensuring that systems are in place to allow us to effectively monitor outcomes against targets.</p>

<b>Functional body</b>	<b>Objective, responses and actions</b>	<b>GLA analysis and comments</b>
MPA	MPS diversity budget performance review. Annual corporate equalities health check and cultural	GLA has agreed to buy in expertise to achieve this.

## DRAFT

Functional body	Objective, responses and actions	GLA analysis and comments
	climate survey.	
MPS	Diversity Directorate provide management support for business plans and measurement of directorate's performance. Workforce planning unit. Diversity benchmarking . Membership of the GLA Group procurement Officers Network. Accountability to MPA.	GLA are concerned that there is a consistency across all this work in terms of information/ monitoring of all equality target groups. GLA have not had sight of any reports produced for any of these actions.  Are lessons being learnt, practice disseminated into MPS from procurement network.

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## **SUMMARY**

The diversity application and monitoring report is the first system review of the diversity and focused on the management of workforce diversity within the MPA and MPS.

The overall conclusion of the Audit was that although a significant amount of work and progress had been made, at the present time there were not adequate controls in place to support workforce diversity within the MPS.

The report and recommendations will form one of the primary objectives of the EODB for 2003/06

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## SYSTEMS REVIEW OF DIVERSITY APPLICATION AND MONITORING

### 1. Summary of Findings and Recommendations

**WE HAVE CATEGORISED THIS SYSTEM AS *HIGH* RISK AND A FOLLOW UP AUDIT WILL BE CARRIED OUT IN *SIX* MONTHS TO MEASURE THE IMPLEMENTATION OF OUR RECOMMENDATIONS.**

The recommendations in this **Appendix** have been categorised according to the level of importance we attach to them. The categories are:

**High** Recommendations which arise from major weaknesses in controls that expose the business to high risk of loss or exposure in terms of fraud, impropriety, poor value for money, or failure to achieve MPS objectives. Remedial action must be taken urgently.

**Medium** Recommendations which, although not fundamental, relate to shortcomings in control which expose the individual systems to a high risk of exposure or loss. Remedial action must be taken but may not be so urgent.

**Low** Recommendations which, although not critical to a system, address areas where management would benefit from improved control.

## DRAFT

REP REF	Audit Finding	Risk	Recommendation	Category	Management Response & Target Date
<b>Strategy and Policy</b>					
6.1	<p>There has been no joint statement or strategy made by the MPA and the MPS.</p> <p>There is no MPA diversity strategy. There is an MPA action plan in the Race Equality Scheme (RES).</p>	<p>Strategy could be seen as piecemeal by staff Organisations pulling in different directions</p> <p>No cohesive and inclusive approach to diversity within MPA Focus is not inclusive Staff not buy in to the strategy</p>	<p><b>MPA</b></p> <ul style="list-style-type: none"> <li>Issue a policy statement on diversity that is supported by MPA and MPS strategies.</li> <li>Develop a comprehensive diversity action plan that the RES supports.</li> </ul>	<p>H</p> <p>H</p>	<p><b>Accepted</b> <b>MPA</b> - The Authority is in full support of this recommendation and will work with the MPS to prepare a draft statement for ratification by the EODB and the MPS Diversity Board. <b>September 2003</b></p> <p><b>Accepted</b> <b>MPA</b> - Work commenced on this area late 2002, however, with the need to re-prioritise work allocation, because of a shortage of staff this work has been in abeyance. Steps will now be put in place to recommence this area of work as a priority. A first draft of the strategy will be presented to the EODB in September 2003, with an aim to publish this by November 2003. <b>November 2003</b></p>
6.2	<p>There is a perception in MPS that diversity is an externally focused issue with particular relevance placed on race and gender. There has been no</p>	<p>Internal Diversity issues not seen as important Embarrassment to the MPS reputation Internal diversity not seen as an inclusive issue</p>	<p><b>DOIT</b> promote the diversity strategy to highlight the workforce issues addressed therein incorporating a statement as to what diversity in the workplace means.</p>	H	<p><b>Accepted *</b> <b>MPS</b> - DOIT is looking to complement and further expand the messages of Protect and Respect to its entire staff via a strategic</p>



## DRAFT

REP REF	Audit Finding	Risk	Recommendation	Category	Management Response & Target Date
	<p>There has been no review of how other organisations have addressed these issues.</p> <p>There is no clear statement within the MPS of the objectives and benefits of having a diverse workforce.</p>		<ul style="list-style-type: none"> <li>Ascertain what processes and procedures are in place within organisations that have had greater cultural mix of staff over a period</li> <li>Ensure that MPS have a clear statement on the objectives for successful management of diversity within the MPS and that the benefits are highlighted to all staff</li> </ul>	<p>M</p> <p>H</p>	<p>and ETs, Promotions, Training and appraisal. Monitoring will be extended to areas of sexual orientation, disability and faith. Data capture an analysis will be progresses through METHR, or our new workforce management information system. It is accepted that more modelling needs to be carried out</p> <p><b>Accepted**</b></p> <p><b>Accepted</b> See response to 6.2.1</p>
6.4	There are a number of strategies in place within MPS and there are HR areas of responsibility which overlap with diversity where gaps and impacts have not been identified.	<p>Duplication</p> <p>Lack of clarity for staff regarding responsibilities and contacts</p> <p>Lack of staff buy in</p> <p>Not cohesive working or message</p>	HR review all their strategies and action plans to ensure that it is clearly recorded which impact on other diversity related strategies and plans and how any overlaps are to be monitored and reported on.	H	<p><b>Accepted (MPS and MPA)</b></p> <p><b>MPS</b> - Overlaps are identified at an early stage and duplication is avoided through the oversight panels which are led by an appropriate senior officer.</p> <p><b>MPA</b> - Welcomes the recommendation and will initially work with the Head of</p>

## DRAFT

REP REF	Audit Finding	Risk	Recommendation	Category	Management Response & Target Date
					<p>Secretariat and other policy leads to develop processes whereby this can be achieved. The MPS Policy Clearing House has already developed a framework that can be adapted by the MPA to achieve this recommendation.</p> <p>This will also add significant learning for the annual progress report on the MPA Race Equality Scheme. The MPA and MPS have recently set up an external reference group with membership of the key stakeholders to assist with the development of the RES impact assessment framework. The outcome of this exercise will add significant benefits to the recommendation.</p>
6.5	The cascade of the strategy to Boroughs is fully supported by IA but this needs to be extended to all areas of the MPS.	Diversity strategy is applied unevenly across MPS Staff not receive same treatment	The cascade of diversity strategies be rolled out to all command units across the MPS	M	<b>Accepted**</b>
6.6	The cascading of the diversity message within MPS has mainly been on	Inappropriate behaviour in the workplace not addressed External diversity issues seen as	A programme addressing internal diversity issues training be set once the DOIT strategy is in	M	<b>Accepted**</b>

## DRAFT

REP REF	Audit Finding	Risk	Recommendation	Category	Management Response & Target Date
	external issues through the CRR training. There has been no internal diversity training provision or guidance issued to staff and local welcome and induction packs do not include equal opportunity and diversity messages. The MPA does not have a reference to equal opportunities and diversity in its welcome pack.	a perception issue and not a behaviour issue Loss of good staff	place.  <b>DOIT</b> consider compiling an awareness pack for staff, possibly based on the "Policing Diversity" booklet for issue to all staff in the MPS.  <b>MPA</b> ensure that the induction pack contains the equal opportunities statement and a summary of the diversity strategy and objectives  <b>MPS Diversity Directorate</b> advise all local commands to include equal opportunities statements and MPS diversity message in induction and welcome packs	M  M  M	<b>Accepted</b>  <b>Accepted</b> <b>MPA - This is in hand</b>  <b>Accepted</b>
7.1	MPA have broad-brush HR policies providing flexibility of approach but not always providing sufficient direction to managers.  There are no formal	People in MPA treated differently due to way policy is understood and applied Loss of Employment Tribunal Embarrassment	<b>MPA</b> Review HR policies and provide more detailed guidance where the risk of varied application is high or where it would have an important impact to either individuals or the organisation.  Review current systems in place	M  M	<b>Accepted</b> <b>MPA - Sub-group of MPA members and officers has been recently established to provide a greater overview of the Authority's application and integration of equal opportunities policies and practices. The sub-group will provide this overview that is recommended by this report to ensure, at the highest</b>



## DRAFT

REP REF	Audit Finding	Risk	Recommendation	Category	Management Response & Target Date
	<p>The review does not include a comparison of terms and conditions, policies and procedures for police and civil staff.</p> <p>The corporate procedures and manual are not included in this review and nor are the locally produced policies and procedures.</p>	<p>Corporate strategies and Policies are not reflected in local procedures and processes Diversity not joined up top to bottom of the organisation Loss of Employment Tribunal Embarrassment to MPS and MPA Loss of staff faith in diversity framework</p>	<p><u>HR</u>, in conjunction with <u>DOIT</u>, include an analysis of the variations in terms and conditions of staff within the overall policy review, and ensure that any variations identified are due to differences in the nature of the work.</p> <p>The health check applied to corporate policies is applied to corporate procedures and revision of the manual and cascaded for a review of local command unit policies and procedures.</p>	<p>M</p> <p>M</p>	<p><b>MPS</b> - This has already been recognised and the new policy development framework differentiates more clearly between policy and operating instructions including mandatory requirements and non-mandatory aspects. HR will ensure that the guidance will be colour coded to provide a clear distinction between the two.</p> <p><b>Accepted*</b> <b>MPS</b> - The scope to vary contractual terms and conditions by HR is relatively limited. Adverse trends from a diversity perspective would be picked up by an analysis of the appropriate activity. Differences in policy should be as a result of legitimate differences in legislation or corporate requirement, as well as duties. This aspect is included in the policy review project.</p> <p><b>Accepted**</b></p>

## DRAFT

REP REF	Audit Finding	Risk	Recommendation	Category	Management Response & Target Date
					MPS - HR guidance has been health checked within the Policy Review. Local HR Managers will receive guidance on reviewing their own local policies against Diversity legislation and this is likely to form an integral part of their local "People Strategy" progression plan.
7.3	<p>There is no list in MPA or MPS of who should be consulted in making or amending policies.</p> <p>Policies set by Diversity Directorate are then owned by HR and there is no system for ensuring continuing discussion and consultation on amendments to these policies.</p> <p>There is no recorded policy in MPA for retention of</p>	<p>Relevant parties not consulted</p> <p>No buy in from staff</p> <p>Legal compliance not checked</p> <p>Duplication of effort</p> <p>Policy setting not cohesive</p> <p>No evidence of consultation</p> <p>Lack of buy in</p> <p>Non-compliance with legal requirements</p> <p>No formal sign off of policy so no clarity of accountability or ownership</p>	<p>When policies are being set there is an initial identification of interested parties. This is recorded and a record then kept of contact made and responses received.</p> <p>When policies are set there is a record of contributing parties and the MPS Diversity Directorate and HR liaise over any amendments to key policies.</p> <p><b>MPA</b> set a policy on retention of documents and ensure all papers on policy setting are maintained for a set period, providing an adequate management trail.</p>	<p>M</p> <p>M</p> <p>M</p>	<p><b>Accepted (MPS and MPA)</b></p> <p><b>MPA</b> – The process for achieving this is to be agreed and recommended to the MPA Members and the MPS Diversity Board for approval. The MPS has developed a process through the policy clearing house, which could be adapted to achieve this recommendation. <b>February 2004</b></p> <p><b>Accepted (MPS and MPA)</b></p> <p><b>MPA</b> – The MPA will set up processes for achieving this. <b>February 2004</b></p> <p><b>Accepted</b></p>

## DRAFT

REP REF	Audit Finding	Risk	Recommendation	Category	Management Response & Target Date
	<p>documents. There was inadequate management trail within MPA and MPS for policy setting.</p> <p>Documentation of the formal sign off of policies was not retained.</p>		<p><b>Diversity Directorate</b> seek confirmation of document retention requirements within the organisation and ensure there is a clear management trail.</p> <p>The procedure in MPA and MPS for approving and signing off policies is recorded and all policy documents are formally signed off and retained.</p>	<p>M</p> <p>M</p>	<p><b>MPA</b> - The MPA welcomes and accepted this recommendation. This procedure will assist significantly in helping the MPA in achieving one of the key duties of the Race Relations Amendment Act – that of assessing all policies for the impact of race. <b>February 2004</b></p> <p><b>Accepted</b></p> <p><b>Accepted (MPS and MPA)</b> <b>MPA</b> - welcomes and accepts this recommendation. This was identified as a gap in the MPA internal processes at the time of developing the Race Equality Scheme. Action on this recommendation will be vital should the time arise when the HMIC and Commission for Racial Equality carries out their inspection of the MPA processes to support the</p>

## DRAFT

REP REF	Audit Finding	Risk	Recommendation	Category	Management Response & Target Date
					<p>implementation of the Race Relations Amendment Act. Such a process is also good management and organisations administration</p> <p>The process for achieving this are still to be agreed, however, it is expected that there will be broad involvement, including representation by the internal audit</p> <p><b>April 2004</b></p>
7.4	There is no evidence of liaison between the Policy Clearing House and DOIT.	Opportunities missed to mainstream diversity Policy development not supporting the diversity agenda Key staff not consulted in the creation of policy with diversity implications	<b>DOIT</b> liaise with the Policy Clearing House to ascertain what diversity issues are embedded in the new policy development system and advice provided to policy units.	M	<b>Accepted*</b>
<b>Roles and Responsibilities</b>					
8.1	The terms of reference for the committees in MPA and MPS do not clarify authority, nor identify role and objectives of the committees. MPS TORs do not include details of how the committee is run.	Decisions made at inappropriate level Inappropriate decisions made Policy and strategy not comprehensive	Terms of Reference for committees be reviewed to ensure that they include the authority of the committee and its purpose and objectives.	H	<b>Agreed (MPS and MPA)</b> <b>MPA-</b> The General London Authority for Equalities for All Review and subsequent recommendations from the Mayor's office, which has an overview for the MPA Equalities Performance Future recommends that each committee should

## DRAFT

REP REF	Audit Finding	Risk	Recommendation	Category	Management Response & Target Date
	Papers to committees do not have a standard template in MPS and an incomplete template in MPA.	Wasting time of the committee Decisions not fully informed and therefore inappropriate Strategies and Policies set without a methodology in place for review Monitoring not focused Reporting not comprehensive	<b><u>MPA and the Diversity Directorate</u></b> agree a standard template for all papers to committees including the following: Purpose of paper Action required by Committee Where paper needs to go from the committee (e.g. to another Board for authorisation) Financial implications, Benefits and risks of any proposal Proposed monitoring and reporting system including success criteria	H	regularly report their Equalities progress to the EODB. The lines of accountability for the Committee's diversity performance are currently unclear. A paper proposing a way for addressing this will be presented to the EODB in September. <b>September 2003</b>  <b>Accepted (MPA and MPS)</b> <b>MPA</b> – The process for progressing this will be addressed as a matter of urgency. <b>September 2003</b>
8.2	There is a large cross over in terms of HR and DOIT including policy being set by one and then owned by the other.	Duplication Lack of ownership Staff not understand who responsible – apparent confusion does not get staff buy in Policy amended in a way that would not be supported by those who wrote it	The role of <b><u>DOIT</u></b> in Diversity Directorate is clarified to all those involved and points of cross over with HR identified and recorded, and methodology for management of this cross over agreed.	H	<b>Accepted**</b> See 7.2.1 response
8.3	There is no defined role for the local diversity contacts and no network provided for sharing best practice, experiences and feeding	Diversity not cascaded throughout MPS Diversity message diluted or altered across MPS Staff get mixed messages	<b><u>Diversity Directorate</u></b> set up a network of diversity contacts across MPS with clarity of role and opportunities set for sharing ideas and information.	M	<b>Accepted*</b>

## DRAFT

REP REF	Audit Finding	Risk	Recommendation	Category	Management Response & Target Date
	into strategy and corporate policy making.  There was no disability officer assigned at either of the Boroughs visited.				
8.4	There is no minimum requirement for the constitution of police support associations and no review by HR.	Police Support Associations set up with inappropriate remit MPS seen to support organisations that the MPS has no authority over	<u>ACHR</u> review the constitutions of the Police Support Associations to ensure that they adequately address the issues included in the guidelines and criteria set for ratification.	M	<b>Accepted</b> <b>MPS</b> - Many of the Associations have long-standing and often national constitutions. The practicality of forcing any change could be limited. The main scope of development is in ensuring that new associations comply with the constitutional template.
<b>Monitoring</b>					
9.1	In MPS there is a lot of statistical monitoring in place, but little of it is directly correlated with the desired outcomes of the diversity strategy and there is little qualitative review of how people feel within the organisation. This information is shared with the MPA and the MPA also request data for monitoring purposes.	Monitoring not focused Key information not collated or identified There are overlaps in the monitoring Monitoring not used for addressing issues Key information gets lost in the amount of data provided	<u>MPA and the Diversity Directorate</u> review the monitoring requirements for the MPS workforce, identifying what statistics are collated, how they are reviewed and what measures of success they feed into.	H	<b>Accepted (MPS and MPA)</b> <b>MPA</b> – detailed action will be developed to progress the recommendation. <b>November 2003</b>
9.2	There is no collated	No baseline set	<u>DOIT</u> review the current delivery,	H	<b>Accepted</b>

## DRAFT

REP REF	Audit Finding	Risk	Recommendation	Category	Management Response & Target Date
	information of the action already being taken on internal diversity issues across the MPS	Improvements not recognised Cannot measure change Cannot assess impact Inefficient use of funds not identified	strategies and policies across MPS to identify and share best practice		
9.3	<p>There is an emphasis in all Diversity Directorate working groups action plans on the actions needed rather than the outcomes desired. There is no formal process for reviewing the success of the actions in achieving the outcomes.</p> <p>The individual actions noted as completed by the work groups are not reviewed to ensure that they meet the needs of the overall diversity strategy.</p>	<p>Work undertaken does not address the needs of MPS Waste of time and money</p> <p>Work carried out does not support the overall diversity strategy Mixed messages sent to staff Opportunities lost Lack of buy in from staff</p>	<p>Each MPS working group report by the year-end on how the actions taken have supported progress toward the desired outcome and how this has been monitored.</p> <p><b>DCC4</b> representatives on the various working groups peer review the actions to ensure they support the overall diversity strategy prior to them being noted as completed.</p>	<p>H</p> <p>M</p>	<p><b>Accepted*</b> MPA noted that the Authority will wish to discuss with the MPS its role in agreeing the reporting process that will be agreed.</p> <p><b>Accepted</b></p>
9.4	In measuring outcomes against input MPA and MPS have not yet defined a comprehensive list of budget expenditure. In particular Borough work has not been incorporated.	Value for money not achieved Ineffective use of resources	<b>MPA and Diversity Directorate</b> clarify the areas that should be calculated as part of diversity spend, and what spend is on workforce issues.	M	<b>Accepted (MPS and MPA)</b> <b>MPS</b> - It is not currently practical to accurately calculate spend on diversity work. The budgets of specialist units leading to specific areas of diversity are known, similarly specific

## DRAFT

REP REF	Audit Finding	Risk	Recommendation	Category	Management Response & Target Date
	There is no separate budget heading for diversity officers at Borough.		A nominated officer in each Borough or unit be identified with responsibility for reporting on input and output in relation to the diversity strategy at a local level	M	<p>projects and activities could be recorded now but this would provide only part of the picture and would be misleading.</p> <p><b>MPA</b> – Accepts and welcomes this recommendation and will be continuing to work with the Diversity Directorate to achieve this in the next financial year budget submission. <b>September 2003</b></p> <p><b>Accepted</b></p>
9.5	Time spent by Police Support Association members is not monitored (although guidance is provided). Delivery is also not reviewed so there can be no understanding of value added or value for money provided.	Input and value of associations not known or recognised Individuals not accountable for their time Associations not supporting the MPS in the achievement of its objectives	<p><b>HR</b> introduce facility time arrangements for Police Support Association Executive members and this should then be formally monitored.</p> <p>Police Support Associations asked to report on activity to the Association Forum at least annually. This information can then be shared with the Diversity Directorate.</p>	<p>M</p> <p>M</p>	<p><b>Accepted</b></p> <p><b>MPS</b> - Monitoring the use of facility time by management is sensitive. Too intrusive a method could jeopardise the development of the relationship with the associations. A business case template has been issued to the associations for use when a case is being made for a full time representation</p> <p><b>Accepted</b></p> <p><b>MPS</b> - Agreed – this</p>

## DRAFT

REP REF	Audit Finding	Risk	Recommendation	Category	Management Response & Target Date
					recommendation will be pursued through the AC's Forum with the Staff Support Associations and with the Diversity Directorate.
9.6	<p>There is no monitoring information fed into Diversity Directorate on the application of policies and procedures apart from grievance and employment tribunal statistics</p> <p>Grievance statistics are compiled from returns from across MPS but there is variation as to when there is a return made.</p>	How people are being treated as a result of policies is not reviewed Policy impact not measured	<p><u>Diversity Directorate</u> in conjunction with HR review the best methods for collating information on the application of policies and procedures.</p> <p>The newly set fairness at work policy include clarification of when a grievance should be reported to HR for inclusion in statistical studies.</p>	H  M	<p><b>Accepted*</b> <b>MPS</b> - HR will support this, through the HR Evaluation team that carries out local audits on key HR functions including Diversity.</p> <p><b>Accepted</b> <b>MPS</b> - The Fairness at Work Policy and guidance will contain this information and will be updated prior to its launch and publication. The recent appointment of a Fairness at Work Co-ordinator will ensure that this issue is addressed.</p>
9.7	HMIC and Internal Audit carry out diversity specific work but there is no system for reporting findings related to diversity to the Diversity Directorate	Opportunities missed to gather data Areas of concern that are identified are not managed through the diversity framework Piecemeal approach	<u>Diversity Directorate</u> contact relevant inspection groups to agree how diversity issues can best be reported.	M	<b>Accepted*</b>
<b>Reporting</b>					
10.2	Staff responses on the	Figures inaccurate	MPS record the method of	M	<b>Accepted</b>

## DRAFT

REP REF	Audit Finding	Risk	Recommendation	Category	Management Response & Target Date
	<p>ethnic monitoring form which are based on self perception are then translated into "white" or "visible ethnic minority" without any reported explanation for how the figures were collated.</p> <p>MPS do not at the present time analyse or report on the 16+1 ethnic categories of staff. (MPS use two more categories but the collation of these figures for monitoring purposes is made clear</p>	<p>Figures misleading MPS in the long term does not adequately reflect the London community in terms of race</p>	<p>collating the figures for visible ethnic minorities in their annual reports.</p> <p>MPA and MPS review the need for monitoring and reporting the ethnic mix of staff in more detail, taken directly from the ethnic monitoring forms to measure progress towards the objective of reflecting the ethnic mix of the community served.</p>	M	<p><b>MPS</b> - The HR Strategic Management team will ensure that corporate annual reports include VEM statistics and contain the methodology for data collection.</p> <p><b>Accepted (MPS and MPA)</b> <b>MPS</b> - Agreed – we will ensure that ethnic minority data summaries and reports will, where appropriate, now include a wider focus than just Visible Ethnic Minorities. <b>MPA</b> – A great deal of work is already underway in this area through the recruitment task force. A similar level of scrutiny is required on retention issues and the recommendation will be taken forward in full discussion with the MPS Human Resources, DOIT and Diversity Directorates</p>
10.3	<p>There is no requirement for committees to report on what they have achieved</p>	<p>Time of committee wasted Non-accountability of committee Progress no recognised Improvements not identified to committee structures</p>	<p><b><u>The MPA secretariat and DCC4</u></b> collate action points and completed actions from meetings and report on them annually. Outcomes should be identified and highlighted and the</p>	M	<p><b>Accepted (MPS and MPA)</b> <b>MPA</b> – Agreed, however the procedure for progressing this is still to be agreed.</p>

## DRAFT

REP REF	Audit Finding	Risk	Recommendation	Category	Management Response & Target Date
	<p>There is no update issued to MPS staff of "3 years on" which details the achievements of the diversity framework. The original poster was published in February.</p> <p>Similarly there is no overview on the Diversity Directorate intranet site of how Diversity is managed across the MPS and the key players and their roles.</p>	<p>Staff do not know the work that is being carried out No staff buy in</p> <p>Staff do not know who to contact Staff cannot see that there is a joined up approach</p>	<p>information shared with staff via the intranet</p> <p>DOIT post updates of delivery on the intranet</p> <p><b><u>Diversity Directorate</u></b> consider the possibility of providing a simplistic summary of the key players and roles in delivering diversity throughout the MPS, including a DOIT site on the intranet</p>	<p>M</p> <p>M</p>	<p><b>Accepted</b></p> <p><b>Accepted</b> Audit trails show that the intranet site is visited regularly</p>

\* = where the recommendation related to the MPS but the MPA also responded, agreed with the recommendation and will be seeking to support the MPS in its delivery

\*\* = where the recommendation related to the MPS but the MPA also responded, agreed with the recommendation and beyond supporting the MPS, the Authority will also review its own procedures and practices in the light of the recommendation

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APPENDIX

## **MPA EQUAL OPPORTUNITIES AND DIVERSITY WORK PROGRAMME 2002/03**

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## **SUMMARY**

### **MPS strategic and legislative Diversity strategy and work programme**

Members have previously received copies of the MPS Diversity Strategy and Action Plan. This is attached for the completeness of the Strategic document.