

Committee(s): Police Committee	Date(s): 2 nd November 2012
Subject: Equality Diversity and Human Rights (EDHR) Update	Public
Report of: Commissioner of Police POL 70/12	For Information
<p style="text-align: center;"><u>Summary</u></p> <p>In February 2012, the Force launched a new Quality of Service/Equality, Diversity and Human Rights Strategy (QoS/EDHR), which sought to consolidate the NPIA Equality Standards for the Police Service (ESPS) which was launched in 2010, into a plan to deliver against four key areas of work: ‘Operational Delivery’, ‘Organisational Process’, ‘Our People Our Culture’ and ‘Local Accountability’.</p> <p>In addition to the QoS/EDHR plan, the Force continues to address the issues raised by the independent Lokahi Report into retention and progression of minority staff.</p> <p>This report outlines the work that has been progressed within the last six months. Highlights include work to improve links into the Lesbian, Gay, Bisexual Transgender community; launching a domestic violence ‘toolkit’ aimed at HR and Occupational Professionals in the business community; a joint peer review by Kent and Essex Police of the Force’s progress against the NPIA Equality Standards for the Police Service (ESPS); scoping future EDHR training. The Report also identifies areas where work continues, including the development of a Talent Management Strategy under the Lokahi action plan.</p> <p>The report also includes an update on IAG consultation and EDHR Unit staff changes under the City First Change Programme.</p> <p>Recommendations</p> <p>It is recommended that Members receive this report and note its contents.</p>	

Main Report

1.0. Background

1.1. In February 2012, the Force launched and published the new Quality of Service and Equality Diversity and Human Rights (QoS/EDHR) Strategy on the external City of London Police website. The strategy breaks down EDHR delivery into four key areas of work; *Operational Delivery, Organisational Process, Our People Our Culture and Local Accountability*.

1.2. The QoS/EDHR Board is the strategic board that provides governance and oversight to the QoS/EDHR strategy. This board meets every quarter and is chaired by Assistant Commissioner Dyson, reporting extraordinarily to the Force's Strategic Management Board when required. The next meeting will be held on 8th November 2012. The Lead Member for EDHR, Alderman Alison Gowman, is a member of this board, together with a representative of the IAG, to provide independent advice and scrutiny.

1.3. In addition to the QoS/EDHR Strategy, work continues to progress on the recommendations made within the independent Lokahi Report, which outlines areas of improvement in relation to the progression and retention of minority staff. These recommendations could be captured within the 'Our People Our Culture' section of the QoS/EDHR action plan, but have been kept separate to date, to ensure focus is maintained on this important area of work.

2.0. QoS/EDHR Update

2.1. 'Operational Delivery'

2.1.1. In June 2012 the force introduced the role of Lesbian Gay Bisexual Transgender Liaison Officers (LGBT LO), identified as good practice from the Metropolitan Police. A number of staff within the Public Protection Unit (PPU) were trained in April this year, along with two community officers who will carry out the community LO function. The main role of the LO is to help the Force identify and access LGBT communities. The Force is also working with Stonewall¹ to assist in identifying the City of London's LGBT community. The Force has recently renewed its membership of Stonewall to improve and provide independent advice and scrutiny on the work the Force is currently doing with lesbian, gay and bisexual (LGB) staff and members of the community. Stonewall have agreed to peer review the Force's processes and practices, which will allow the Force to be measured against their Workplace Equality Index. The

¹ http://www.stonewall.org.uk/about_us/2532.asp

Workplace Equality Index is Britain's leading tool for employers to measure their efforts to tackle discrimination and create inclusive workplaces for lesbian, gay and bisexual employees. This work is due to be undertaken in early 2013.

2.1.2. In September 2012, the Force's Public Protection Unit (PPU) launched a Domestic Violence Prevention Toolkit aimed at Human Resources (HR) and Occupational Professionals in the business community. The launch was attended by Baroness Scotland and was supported by many large financial institutions. The toolkit provides advice and guidance to City employers to identify and support staff suffering domestic abuse. The PPU will distribute the toolkit to City employers, including the Force's own workforce, as well as distributing the toolkit to other Forces within the UK, continuing to raise awareness of domestic violence and the impact it has on the work place.

2.1.3. The Association of Muslim Police (AMP) introduced a dedicated 24 hour help-line available during Ramadan this year to offer advice to all staff when dealing with Muslims in an operational context (i.e. searches, arrests, interviews etc). A Ramadan Guidance document was also produced and made available to staff, which has recently been identified by NPIA as good practice. The guidance document helped to answer common questions, to assist staff engage with Muslim colleagues and the wider Muslim community during Ramadan. Through the help-line the AMP were able to assist with 5 different requests for information from staff members. The AMP is planning an event in November at Guildhall to celebrate the second Eid and the end of Hajj. The event is aimed at Muslims who work in the City of London to raise awareness of the work the City of London Police are doing around Hajj fraud, Islamophobia and also to engage with the Muslim business community.

2.1.4. Earlier this year, two members of staff attended a training course run by 'Age UK' on how to deliver personal safety advice to the elderly. The package comprised of six sessions, covering various aspects of safety and security. The first session has recently been delivered to elderly groups in Tudor Rose Court and the Barbican, and plans are in place to identify other groups who may benefit from the input. The aim is to deliver the full safety package to elderly members of the community.

2.2. 'Organisational Process'

2.2.1. On 28th February 2012, the Force requested a joint peer review by Kent & Essex Police, to evaluate our progress against the 'baseline' level of the NPIA Equality Standards for the Police Service (ESPS). The result of the review has shown that the Force has achieved 'baseline' across all of the standards. The Force had self-assessed in September 2011 and reported the results to the

QoS/EDHR Board in November 2011. The Assistant Commissioner made a strategic decision at this meeting, that the Force would aim to achieve 'Integrating' level to demonstrate our continued commitment to the ESPS. Those 'Integrating' standards have been included within the QoS/EDHR action plan and the standards features as a regular agenda item at the QoS/EDHR board. Work is continuing to achieve 'Integrating' level by March 2013 when a further peer review is planned.

2.2.2. In order to meet the requirements of the Equality Act, a generic Equality Impact Assessment (EIA) has been undertaken for the City First Change Programme. However, as the programme has progressed, good practice has identified that to demonstrate 'due regard', more detailed work is required. (The EIA will allow the Force to assess the likely or actual effects of any changes to functions, on the delivery of services). As changes are agreed for each area of the Force, an EIA will be completed specifically to look at the effect of the proposed change on staff and service delivery. This will be documented separately for each area and attached to the 'Request for Organisational Change' document, required for professional and local consultation. A more specific detailed piece of work has also been commissioned to conduct EIAs on all 'functions' over the next three years. The Force will publish a three-year plan in December 2012, detailing when the functions will be reviewed. The functions will be prioritised as high, medium or low, depending on the impact they have on service delivery (i.e. stop and search would be a high priority function). Each EIA will be published on the website when complete.

2.4. 'Our People Our Culture'

2.4.1. EDHR training is fundamental in ensuring that the Force clearly sets out how it expects its' staff to treat members of the community and each other. The Force has historically undertaken a wide and varied range of EDHR training, learning from its' own and others good practice on the best ways of helping staff learn and understand issues. The recently appointed EDHR Manager, Mrs Nagina Kayani, has been tasked to quality assure the current EDHR training and report to the Force Strategic Management Board (SMB) in November outlining areas of good practice and recommendations on any areas for improvement.

2.4.2. Recognising the benefits that annual staff surveys can bring to an organisation, the Commissioner requested that a staff survey was undertaken in July 2011, which was to be repeated annually. Due to the Olympics/Paralympics, the July 2012 survey was delayed and launched on 1st October 2012, for a period of four weeks. The survey will measure how people feel about working for the City of London Police with a range of questions about leadership and job satisfaction. A strategic decision was made this year, in

consultation with union and Federation Representatives, to collect diversity data; this will identify any emerging trends affecting any specific groups of staff. The results of the survey will be considered at SMB in December 2012.

2.5. 'Local Accountability/Local Governance'

2.5.1. HMIC recently wrote to all Forces informing them of the likelihood of a potential inspection on 'The Use and Effectiveness of Powers to Stop and Search' during 2013. Fieldwork is currently underway during October through to December to determine whether HMIC will inspect all forces or only those perceived to be 'at risk'. HMIC will consider data from stakeholders such as the Equality and Human Rights Commission and NPIA, using data from their 'Next Steps' programme, which works with forces to ensure transparency and accountability in the use of the Stop and Search. The City of London Police have pre-empted the interest in 'stop and search' and identified how the 'Next Steps' programme could improve and challenge our operational working practices and procedures. The Force has therefore arranged for a 'Next Steps' peer review, which is due to be undertaken by NPIA on 29th October 2012.

2.6. Lokahi Action Plan

2.6.1. The Lokahi Action Plan update was submitted to your March Committee and a number of areas have been progressed since this time. In the area relating to 'ensuring that transferees' skills are positively used', all officers' skills are now registered on the HR System and staff are required to regularly update their own profile and provide information. Also, as part of the City First Change Programme, engagement workshops for transferee officers have been run to capture any emerging issues from this specific group. The feedback obtained was used when drawing up City First processes and proposals. This style of engagement has proved invaluable and it will be used again during implementation. The force will use the same approach to 'engagement' when the review of the New Policing Model takes place.

2.6.2. The action to restore confidence in the complaints (Grievance) procedure regarding human relationships and working practices, has been developed and the Force now regularly publishes grievance data as part of the compliance requirement of the Public Sector Duties. The number of grievances and the reasons they are submitted is now an agenda item at the Organisational Learning Forum, where lessons learned can be implemented. A Gold Group has also been introduced which aims to monitor and manage all employee relations cases to ensure that all actions are appropriate.

2.6.3. The recommendation that informal communication processes are complemented by a transparent, prompt, formal one, has seen a specific communication strategy being introduced to support the City First Change Programme. This includes a rumour mill section where staff can ask questions; staff suggestions page; regular briefings from the Assistant Commissioner, which allow staff the opportunity to respond and to make comment; senior officer road-shows and specific events, such as the Chief Officer Team who held a live on-line Q & A session for staff on the 29th August. To support this and to improve communication flow, a new Management Briefing document is circulated for managers to brief staff and seek feedback. This process is currently being evaluated by Corporate Communications and any relevant feedback will be used to improve this system of communication.

2.6.4. To encourage and demonstrate the Force's commitment to support staff development, SMB looked at a range of options to support officers considering promotion. In July 2012 SMB agreed to provide financial support and dedicated time at work to support officers taking the first part of OSPRE for the Sergeants and Inspectors process (an exam process designed to test knowledge and understanding of the law and procedures.) Additionally briefing sessions are now incorporated into the promotion process to provide officers information and advice on preparation for interviews/assessments, making the process more transparent and providing equality of opportunity. These were recently conducted for the Superintendents promotion process.

2.6.5. The Talent Management Strategy is an outstanding area of work which encompasses many actions within the Lokahi action plan and completion of this strategy will be a significant step forward in removing barriers to staff development. The Talent Management Strategy will be submitted to SMB in December.

2.7. IAG Consultation

2.7.1. The Assistant Commissioner and newly appointed Superintendent Communities have attended the last two meetings of the IAG (19th July and 27th September). The IAG had raised concerns regarding the impact of change on specific areas of the Force from the City First Change Programme. The Assistant Commissioner was able to provide reassurance on a number of issues, explaining how the Force would consult with the community and consider the impact of change on service delivery during the transition phase of the programme. The IAG had also expressed concerns around the proposed staff changes within the EDHR office. The Assistant Commissioner explained the rationale for change and acknowledged how staff changes could impact on established relationships. The Assistant Commissioner was able to reassure

members of the IAG that continuity would be managed and new staff introduced to the IAG as soon as they were identified.

2.8. EDHR Staff Changes

2.8.1. As part of the City First Change Programme the staffing levels within the EDHR unit have been reviewed. Historically, the EDHR unit was staffed by a Sergeant with additional support of one member of support staff. Due to a number of factors the Sergeant in the EDHR office was retained in post when he was promoted to Inspector and latterly Chief Inspector, to retain the individual's specialist knowledge and established networks (this officer retired in 2011). The EDHR unit has also historically reported direct to ACPO with no middle management oversight. Under the City First Change Programme, the proposal for the EDHR unit has been to move the unit to sit within Strategic Development, providing direct oversight from a Chief Inspector and to reduce the Inspector (part time), Police Constable (part time) and Grade D posts to one Sergeant (full time) and one Grade D post.

2.8.2. Staff roles within Strategic Development have also been changed to ensure that staff work more flexibly across functions. In effect this means that staff can be brought in to assist the EDHR unit should workloads require additional resources. Historically, the EDHR unit have also tended to undertake all EDHR work on behalf of the Force. However, the Force has identified that this approach has not helped to 'embed' EDHR and a change of focus at senior management level has moved responsibility for considering EDHR issues back to managers and staff. This change to working practices will ensure that EDHR matters are considered as 'business as normal', which will allow the EDHR unit to focus their efforts on priority areas of work and providing support and guidance to staff.

3.0 Conclusion

3.1. During the significant period of change over the next 6 – 9 months, the key issue for the Force will be to ensure that we continue to consider the impact of change on the delivery of our services to the community and the impact on staff. The City First Programme Board will continue to provide strategic oversight during the 'implementation' phase of the programme to ensure that EDHR issues are raised and considered. The work being undertaken on EIA will allow the Force to demonstrate that 'due regard' has been given to impact, at all stages of the City First Programme.

3.2. Progress on the QoS/EDHR action plan continues to demonstrate the Force's commitment to improve policies and working practices across all areas

of the Force with clear areas of good practice emerging, specifically in relation to Stonewall and stop and search.

3.3. Progress on the Lokahi Action Plan is currently working towards completion of the majority of areas by the end of 2012. The outstanding issues will be formally transferred into the relevant sections of the force QoS/EDHR plan in January 2013. The QoS/EDHR board will continue to monitor compliance.

3.4. In conclusion the Force is able to demonstrate a pro-active approach in identifying and working with minority groups within our community, through our work with Stonewall, AMP and Age UK. The Force's review of EDHR training will also ensure that staff remain well informed and aware of EDHR issues. The most significant change has been at senior officer level, reinforcing the requirement for all staff to take personal responsibility for considering EDHR issues as 'business as usual'. This has been reinforced during the City First Change Programme by the requirement to continually consider the impact of any change, on staff and on service delivery.

Background Papers:

QoS/EDHR Strategy
QoS/EDHR Action Plan
Lokahi Action Plan

Appendices

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