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## **Equality Standard in the Police Service (ESPS) - Independent Review**

### 1. Introduction

We have been commissioned to undertake an independent review of the City of London Police Force's progress towards Integrating status of the Equality Standard in the Police Service (ESPS).

The two day review included interviews with six employees and the development of a report. This review is a light- touch assessment and is not a comprehensive full inspection of the forces' ESPS journey.

The review assessed the following themes:

1. Accessibility to view information
2. Process of submitting information
3. The promotion of the ESPS process
4. Quality of EDHR resources available to support staff with this area of work
5. Does the evidence captured to date show that the City of London Police met the criteria for the integrating level
6. Observations and Recommendations.

Interviews were held with:

- Alderman Alison Gowman
- Clinton Blackburn
- Jacqueline Clark

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- Julie Hall
- Anna Hewitt
- Asif Sadiq

The Equality Standard in the Police Standard has been designed to support the police service in:

- Assessing current activity
- Identifying gaps in performance
- Benchmarking progress and sharing good practice, and
- Improving performance by delivering positive equality outcomes.

There are three activity levels which are:

- Operational Delivery
- People and Culture
- Organisational Processes

The ESPS is currently under review and most police forces have stopped using the ESPS in anticipation of the new Framework, which is expected in November/December 2013.

### 2. Accessibility to view information

When conducting the two day review I found the viewing of the system relatively easy and simple to use. The parameters of the system are relatively basic, however adding further or new parameters could make using the system more complicated. The Single Points of Contacts (SPoCs) did not raise any concerns regarding the accessibility of the system.

### 3. Process of submitting information

SPoCs are responsible for ensuring that information is collated and submitted on the system. I have not found any evidence that the process of submitting the information was difficult. Although there are many examples of good information that is collated by SPoCs from other police officers, there may be instances where police officers who are delivering excellent services to the

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public may not be able to identify that the service or campaign they deliver may also be a good example of equality and diversity practice.

I have assessed whether there is a need to provide further training to SPoCs to help them use the system. However, this may cause the ESPS to be seen as a 'tick box' exercise, rather than an improvement and good practice initiative.

#### 4. The promotion of the ESPS process

The City of London Police has made very good progress. Since January this year over 53 new examples of good practice have been added to the ESPS process. This demonstrates that the force is making very good progress and the system is becoming embedded.

The ESPS consists of 22 units at each level; I understand that the Force merged some of the units which in effect duplicated information and merged them down to 11 units which they are currently working on. I have inspected the following 4 modules:

- Activity Area 1: Operational Delivery

#### Activity:

Directorates and their partners engage with diverse individuals and communities to run appropriate initiatives that address their particular concerns in relation to serious and organised crime, terrorism and domestic extremism.

#### Evidence

Wards policing together with the AMP held an event at the Guildhall for members of the various faith based communities in the City. The event was opened by the commander and Asif Sadiq from wards policing spoke to the 250 people in attendance about the support that wards policing can provide to members of the city's minority communities. The event was attended by members of the City's Muslim community, including the Ismaili and Ahmidhiyya community, as well as members from the City Sikh and City Hindu network. Officers from wards policing were available all evening to speak to members of the communities and they made some very useful contacts, which they will be following up in order to build even stronger relationships with the City's minority communities.

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- Activity Area 1: Operational Delivery

### Activity:

Directorates work with partners and key stakeholders to plan and deliver services tailored to the specific local needs of children, young persons and other vulnerable groups.

### Evidence:

Wards policing has met up with the NZF which is an organisation which aims to utilise Zakat funds (Muslim Charity funds) and voluntary donations collected in the United Kingdom for the benefit of local, deserving recipients. This group helps some of the most vulnerable members of our community, including widows, orphans, refugees, the aged as well as the homeless. Their work covers five core areas that together form an end-to-end service. Wards policing have set up a memorandum of understanding with the organisation and are hoping to work with them to help Muslim homeless people on the city that they may come across or victims of crime and other vulnerable people who live on the estates in the city who may require assistance as a result of the welfare reform.

- Activity Area 2: People and Culture

### Activity:

CoLP use workforce data to develop and implement appropriate plans for recruitment, retention and progression.

### Evidence:

Shift Patterns and Working Time Directives. Duty Planning monitor and input all changes to shift patterns including flexible and part-time working patterns. The changes to patterns are monitored to ensure the working time directive is complied with. Staff within Duty Planning have a working knowledge of the directive to ensure that where shift changes need to take place because of an organisational requirement, the directive is considered to ensure the appropriate rest between shifts. Police regulations and operational need can require officers to change shift, where an officer has a part time working pattern they would only be utilised as a last resort.

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- Activity Area 3: Organisational Process

### Activity:

CoLP review and monitor feedback from all sources and use it to improve services and initiatives.

### Evidence:

The City of London HR department facilitated 5 promotion processes in Sergeants, Det Insp, Ch Insp, 2 x Superintendent. The boards were developed to give all officers an equal opportunity for success and the 2nd Superintendents process was advertised externally. Guidance and instructions were provided to all officers and the panel members before the process commenced. The process consisted of an application stage at BCU level and the successful candidates then completed a ten minute presentation on a given subject and a 40 minute interview board with 3 panel members. The forces' Diversity Manager was present at some boards to ensure fairness and transparency throughout the process. All officers were offered assistance if required.

Officers with dyslexia and pregnant officers were assisted with extra time and welfare breaks where needed. Feedback from candidates was requested by means of a survey. All officers who took part were offered personal feedback by a member of the interview panel. Action plans were developed by BCU commanders for officers who were unsuccessful and the Promotion Standard operating procedure has been written to allow a fairer and more transparent procedure for all officers to develop in their careers. One of these areas is the relaxation of the restriction that an officer can perform acting or temporary roles above their substantive rank before a review.

An EIA of the promotion process was undertaken to map the progress of different protected characteristic groups and to identify areas of risk for different groups of staff.

- Activity Area 3 Organisational Processes

### Activity:

CoLP review and monitor feedback from all sources and use it to improve services and initiatives.

### Evidence:

The City of London Police completed recruitment campaigns for police officers and specials from 2010-2013. Local communities were contacted by means of

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advertising in local papers and through the CoLP website. Community officers visited the local estates and informed residents of the campaigns and how to apply if interested. Advertisements were placed in areas of minority populations by using specific papers. To obtain a recruitment pack potential candidates could telephone a specific number. All applications were read and shortlisting took place. For the successful candidates who passed the assessment centre the force held interview panels. A Special Constables campaign has just ended and the successful candidates are due to attend an assessment centre on 20th April 2013 and be interviewed by the end of April 2013 and early May 2013. These assessments have been scheduled for a weekend and the interviews have been scheduled to take place in the evening, taking into consideration the working lives of the candidates.

### 5. Quality of the EDHR resources available to support the staff with this area of work

The staff at EDHR provide effective support to SPoCs. This includes working with SPoCs to help them identify areas of good practice and providing support and guidance.

There is evidence to suggest that the SPoC system works very well. SPoCs have a very good understanding of equality and diversity good practice and have demonstrated a clear commitment to the agenda. There is also good evidence of effective leadership on the force's equality and diversity agenda.

### 6. Does the evidence captured to date show that the City of London met the criteria for the integrating level

The Equality Standard is designed to be used as a continuous improvement tool. The 22 units of the framework set out a visual journey of improvement. Each unit has three stages, which allows the police service to assess current performance and plan how to improve. Having a formal framework will enable forces to benchmark performance with others and share effective practices.

The Standard consists of three achievement levels, which are:

- a. Baseline - Assessing an activity that must be in place
- b. Integrating – Assessing an area that must be in place
- c. Excelling – Assessing an outcome that contributes to improved community confidence

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Although we have not assessed all 22 units, nevertheless from the units that have been assessed we believe the City of London has reached Integrating status, subject to our observations and recommendations in section 7 below.

### 7. Observations and Recommendations

It is recognised that the City of London has kept using the ESPS whilst others are waiting for the new framework. I believe this demonstrates the City of London Police's commitment to equalities and diversity and its recognition that they do not wish to lose the drive and focus of their commitment to equalities whilst waiting for the new framework.

The City of London Police has a robust mechanism for scrutiny of its performance across the area of diversity through regular reporting to the City of London Police Committee, which is the police authority for the force and has, a very engaged lead member, Alderman Alison Gowman. This is an area of strength for the force.

I was unable to find any EIAs on the external website. However, I did review 2 recent EIAs which were on the evidence database. These contain relevant information & community profile data which has been used for the determination of the potential impact on different PCs. The City of London Police need to ensure this approach is part of normal practice and that it continues to use data to evidence their decision making in relation to equality issues to meet its obligations under the equality duty.

It is encouraging to see that the City of London Police commissioned the Lokahi report to identify barriers to progression, which the force has responded to through the setting up of a reward & recognition panel, external representation or moderation at promotion boards etc. However, if policies are developed or implemented as a result of such findings, such as the Standard Operating Procedure (SOP) for temporary promotions, this needs to be monitored & reported on, to ensure that the force can demonstrate the impact the changes have had & improve staff confidence.

The City of London Police Force should have a clear talent management strategy that has a defined positive action element. As a small organisation it should be much easier for it to identify internal talent. There are some exceptionally talented officers who appear not to have made any progress over some period of time with the City of London Police Force.

On reviewing the HR policies on the intranet, a number seem to predate the Equality Act 2010 and will need to be updated to reflect the act and bring the HR management across the force in line with best practice in employment.

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