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Annual Report on progress towards meeting the Disability Equality Duty

November 2009

This report will be noted by Northern Joint Police Board on 27th November 2009

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Summary

In accordance with Northern Constabulary's Disability Equality Duty, this annual report outlines the progress the Force has made since 2006 with regard to the actions presented in our Disability Equality Scheme (2006 – 2009). Many of the actions are fully completed while some are ongoing and are represented in our revised Disability Equality Scheme that we have included within our Single Equality Scheme 2009-2012.

This report and our ongoing monitoring work form a significant part of what Northern Constabulary are doing in order to meet their duty to eliminate unlawful discrimination against and harassment of, disabled people, and promote equality of opportunity in relation to disabled employees, disabled service users and disabled people generally in line with the requirements of the Disability Discrimination Act 2005. Our action plan sets out the following aims:

1. To eliminate unlawful discrimination
2. To eliminate unlawful harassment
3. To improve accessibility of the service
4. To promote equality of opportunity
5. To report progress annually

Since 2006 Northern Constabulary has progressed a number of key actions regarding the involvement of people with disabilities at a strategic and operational level. The report outlines what we have done to advance and complete our action plan. Our key achievements include developing a new online reporting system for all types of hate incident, known as Hate Free Highland, establishing our Community Advisory Group meeting and improvements to making our services more accessible to people who are deaf and users of British Sign Language.

Progress with our Disability Equality Scheme Action Plan

Our disability Equality Scheme Action Plan has been split into five key aims and within each of those are a series of objectives. The following update outlines all of the actions that were due for completion up until December 2009 and also includes the updated actions that were proposed in our 2007 annual report. The final section highlights which areas we will continue to develop between 2009-2012.

1.0 To eliminate unlawful discrimination

1.1 Objective 1: Prioritised plan for impact assessment of functions

1. Identify plan to address functional assessment of areas identified as priority by internal Disability Advisory Group.
2. Review results of multi-agency involvement and incorporate in overall plan.
3. Utilise Diversity Excellence Model to pilot first functional assessment.
4. Assess effectiveness of process.

The Force has set up a short-term working group to advance our progress on Equality Impact Assessments (EIAs). The work of this group includes:

- the creation of a prioritisation plan for all of our policies and functions we conduct Equality Impact Assessments
- reviewing the Force Reference Documents (FRDs) on the format of FRDs giving standards/guidance on EIAs
- consider and make recommendations on how other agencies' consultation and involvement could assist us with our process
- consider and make recommendations as to intelligence-led prioritisation of EIAs where issues emerge from reliable sources such as the Community Advisory Group, Grievance Procedures, Community Consultation Survey.

We are currently piloting our first functional assessment with the introduction of the Autism Alert Card Scheme. This scheme was identified as good practice by the Equality and Human Rights Commission when it was first introduced by Strathclyde Police and this was picked up by local autism groups. These were the Highlands and Islands Autistic Society and the Autism Rights Group. This full EIA will be published on our website when the scheme is launched in 2010.

1.2 Objective 2: All new and revised policies include outcome of Disability Equality Impact Assessment

1. Agree Equality Impact Assessment template through Force decision-making process.
2. Integrate revised process into Force decision-making structure.

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3. Identify lead managers/quality auditors for training against revised template.
4. Deliver workshop to identified personnel.
 - The revised EIA template is being progressed by the short-term working group mentioned above including its inclusion in the Force Reference Document on Decision-Making.
 - We have trained 12 members of police personnel in the use of Equality Impact Assessments.
 - Further training courses are scheduled on an annual basis from 2010 onwards.

1.3 Objective 3: Personnel required to undertake EIAs have the appropriate support, contacts and sources of information

1. In association with partner agencies, develop a central register of information on disability.
2. Service Unit Managers and Divisional Commanders to set up contact links with local disability groups and individuals.
3. Develop a process to record details of local engagement.
4. Review and develop list of disability groups and associations to include Island Authorities.
5. Ensure Biennial Public Consultation Exercise gauges satisfaction of people with disabilities with services provided.
6. On receipt of Disability Rights Commission impairment criteria, ensure staff survey analysis includes disaggregated data.
7. On receipt of DRC impairment criteria, ensure employment monitoring includes disaggregated data.
8. Ensure performance data is collated with regards to complaints.

Progress

- The Force's Human Resources Service Unit is ready to implement a new personnel database that will capture data on disability. Work to improve confidence in the system is scheduled to take place so that we can encourage staff and officers to disclose their disabilities. Over time, we will be better placed to monitor the disaggregated data on disability and other equality strands.
- Complaints against the police on the grounds of disability continue to be monitored through quarterly meetings of the Diversity Progress Group.
- The staff survey has been developed to include monitoring of disaggregated data on disability. This survey took place in

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December 2008 and the results of the process are monitored through the diversity progress group.

- We now have a central register for disability groups available and Divisional Commands are aware of the local groups in their area.
- Divisional Commands continue to deliver inputs at the request of local disability groups such as Cheshire house.
- Our Public Consultation Survey 2009 included specific questions on disability hate crime and a monitoring section of respondents. This showed that 18% of respondents noted that they have a disability. This is comparable to the survey in 2001 when the results showed 19% of respondents had a disability. Further analysis of the survey will be undertaken in 2010.
- Professional Standards and Complaints Unit provide regular updates to the Equality and Diversity Progress Group on all disability-related complaints.

1.4 Objective 4: Publish outcomes of the Disability Equality Impact Assessment

1. Annual Report to the Disability Progress Group.
2. Publish summaries on Force website.
 - Progress on Equality Impact Assessments is a standing item on the agenda of the Equality and Diversity Progress Group.
 - The Single Equality Scheme EIA is available on our website and all future EIAs including the one on the Autism Alert Card Scheme will also be published online.

1.5 Objective 5: Work together, where appropriate, to jointly assess the impact of services, policies and functions and recommend relevant proportionate action where negative impact identified.

1. Develop a process for Joint Equality Impact Assessment.
 - Community Planning Partners have opted to assess joint pieces of work by using the lead agency's toolkit. An example of this is the EIA for Hate-Free Highland led on by NHS Highland.

2.0 Aim 2: To eliminate unlawful harassment

2.1 Objective 1: Record and monitor incidents of harassment and discrimination of people with disabilities.

1. Ensure current Force policies report employment related incidents.
2. Ensure processes in place to capture disability related incidents and crime.
3. Further widen the scope of the Racist Incident Multi-agency Strategy with our partners to include all hate incidents/crime.
 - The Force grievance policy enables disability related incidents to be reported and all disability submissions are monitored by the Human Resources Personnel Advisor.
 - The Force has an Incident Recording System, known as Impact; this system captures data on disability related crimes. The data recorded is disaggregated into physical and mental disabilities.
 - The implementation of Hate-Free Highland also ensures that disability-related incidents can be captured and the data disaggregated by physical, sensory, visual impairment and mental health conditions.

3.0 Aim 3: To improve accessibility of the service

3.1 Objective 1: Identify and rectify barriers to access.

1. Review progress of DDA compliance plan of built environment through quarterly diversity progress group.
2. Develop access compliance audit through relevant access panels.
3. Develop methods for circulation of information on our services to our customers with disabilities.
4. Ensure that the review of the Force website includes accessibility requirements for disabled people.
5. In partnership with other public agencies continue to develop our interpreting and translation service ensuring that the needs of disabled people are met.
 - The website includes accessibility requirements for people with disabilities and the Textphone number has been added for people who have hearing impairments or who are deaf. We are also working to implement Textic, a text to voice service for people with visual impairments.
 - At a national level we are supporting work on the production of a DVD for British Sign Language (BSL) users regarding their custody rights and the option of providing BSL interpretation online.
 - We have also produced a list of BSL interpreters who are able to assist the Force during out-of-office hours.
 - Our new online reporting system includes BSL interpretation of how to complete an incident form.
 - The access compliance plan and audit will be taken forward within our revised disability actions within the Single Equality Scheme.

4.0 Aim 4: To promote equality of opportunity

4.1 Objective 1: Staff and managers are aware of their responsibilities in line with the provisions of the Disability Discrimination Act (2005).

1. Address any complaints received of discriminatory behaviour by members of staff.
2. Review diversity learning programme in association with disabled people to ensure the needs of disabled people are included.
3. In association with Occupational Health Advisor ensure that regular briefing to staff and management of services of Occupational Health and Jobcentre Plus.
4. Develop guidance for line managers about making reasonable adjustments.
5. Further develop role of Internal Disability Advisory Group.
6. Incorporate the provisions of the Disability Equality Duty in the Force Diversity Guide.
7. Involve disabled people in input into operational considerations as they apply to the Force Diversity Guide.
8. Utilise the services of the local diversity officer to make arrangements for visits/awareness raising sessions with local disability groups.
9. Review provision of local multi-agency disability awareness workshops.

- Complaints against the police on the grounds of disability are monitored by Professional Standards and quarterly reports are submitted to the Diversity Progress Group.
- The Diversity Level 1 programme has been reviewed and is now being rolled out across the Force. Guest speakers on a range of diversity issues including disability groups have been invited to provide inputs.
- Following direct engagement with the deaf community we are developing an awareness raising DVD on communication skills for all staff.
- Involvement of people with disabilities in updating the Diversity Guide is complete and the guide has now had a national launch. It has been personally issued to all officers.
- A programme of engagement with local access panels has begun. The Inverness Access Panel is represented on our Community Advisory Group and sits on the Highland-wide group of access panels and is therefore well-placed to engage across each of these groups.
- Plans are underway to refresh the position and role of Diversity Officers in our Divisions. This will continue in 2010 and is stated in our Single Equality Scheme Action Plan.

5.0 Aim 5: To report annually on progress

5.1 Objective 1: To provide open and transparent publication of outcomes.

1. Publish Action Plan Results in Public Performance Report.
2. Research and consider other ways of publishing results/outcomes from Action Plan through the Media and Force website.
 - This action plan results are made publicly available at <http://www.northern.police.uk/publications.html>
 - We have included our employment monitoring and hate incident statistics within our Public Performance Report 2008/09 (see page 59 at the above address) Audio files of the Public Performance Report 2008/09 are also available online at this address.
 - In 2010 we will give specific feedback to our Community Advisory Group on the actions we have taken over the last 3 years to improve disability equality.

6.0 Review of actions updated in 2007

6.1 Service Delivery Actions

Northern Constabulary ACTIONS	Progress	Partnership ACTIONS	Progress
<ul style="list-style-type: none"> Further analysis required regarding areas where service indicated as not available and waiting times. 	<ul style="list-style-type: none"> More targeted interventions to be made regarding the inclusion of under-represented groups in the biennial Community Consultation Survey in 2009. this action is now complete. 	<ul style="list-style-type: none"> Review joint tendering for one provider to supply information in alternative formats for all partners. 	<ul style="list-style-type: none"> Under review by the Community Planning Partnership
<ul style="list-style-type: none"> Audit access to Force Operations Centre in line with Call Management Strategy 	<ul style="list-style-type: none"> The textphone number has been more widely publicised within the deaf community, including direct contact with community groups, a press release and greater prominence on our website. 	<ul style="list-style-type: none"> Develop a common accessible information policy. 	<ul style="list-style-type: none"> This is under review by the Community Planning Partnership.
<p>Review Premises Audit</p>	<ul style="list-style-type: none"> Access compliance audits were initially 	<ul style="list-style-type: none"> Review potential for 	<ul style="list-style-type: none"> A joint accessibility guidance document has been developed

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<p>in line with different impairment types.</p>	<p>undertaken by a specialist, outsourced consultancy. The audit framework developed for the initial audit will be used and applied in all subsequent annual audits for the foreseeable future. The Estate Office has a comprehensive record of the audit reports for each of Northern Constabulary's premises and is available for scrutiny on request.</p>	<p>joint audit of premises alongside local access panels.</p>	<p>by NHS Highland and work is underway to roll-out the use of this document in a multi-agency setting. This is the first step to greater collaborative working. Local access panels are also engaged in our Community Advisory Group meetings and there is potential to develop these two pieces of work.</p>
<ul style="list-style-type: none"> Review methods of communication to ensure that alternative formats to letters are 	<ul style="list-style-type: none"> Currently operated on a needs basis. Further work to improve the uptake of alternative formats is required. 	<ul style="list-style-type: none"> In association with disabled people, review potential for multi-agency disability awareness training 	<ul style="list-style-type: none"> This is now being reviewed by the Community Planning Partnership.

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made available to those with sensory difficulties.			
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6.2 Discrimination and Harassment

Partnership Actions	Progress
<ul style="list-style-type: none"> Review Multi-Agency Racist Incident Strategy to include Disablist incidents 	<ul style="list-style-type: none"> Significant work has been undertaken by partners to broaden the scope of our work across all strands of equality. The strategy has been superseded by the creation of Hate Free Highland, the online reporting system for all types of hate incidents.

6.3 Involvement Activity

Police Action	Progress	Partnership Action	Progress
<ul style="list-style-type: none"> • Circulate local list of voluntary groups to Diversity Officers and area commands to ensure they make regular contact on policing issues that may affect them and to report progress. 	<ul style="list-style-type: none"> • Action complete. 	<ul style="list-style-type: none"> • Members of the HWA to ensure that services are aligned in line with community planning requirements. Current Review of Community Planning is aimed to address this. 	<ul style="list-style-type: none"> • Single Outcome Agreement is now in place.

6.4 Actions from the community

Police Actions	Progress	Partnership Actions	Progress
<ul style="list-style-type: none"> • Emphasise the Force Diversity Guide and circulate through Force Information Bulletin to all staff that it is good 	<ul style="list-style-type: none"> • A new ACPOS Diversity Guide has been produced with involvement of a wide range of disability 	<ul style="list-style-type: none"> • In association with NHS Highland liaise with housing department and other relevant groups regarding community safety and health effects of housing criteria with 	<ul style="list-style-type: none"> • Personal Safety talks are being delivered by community safety Unit in the Divisional Commands.

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<p>practice to ask individuals if they have specific needs, including individuals with learning disabilities.</p>	<p>organisations and groups. A hard copy of the booklet has been made available to all frontline officers and staff since January 2009.</p>	<p>regards to adults with learning disabilities and those experiencing mental health conditions.</p>	
<ul style="list-style-type: none"> • Include an input on Huntingtons Disease in Force Diversity Guide 	<ul style="list-style-type: none"> • See above. 	<ul style="list-style-type: none"> • Influence funding authorities to ensure that voluntary organisations have appropriate resources to continue to support ongoing work in line with a long-term sustainable cost/benefit. 	<ul style="list-style-type: none"> • We currently engage with the Scottish Government and the Equality and Human Rights Commission regarding pressing issues for the Highlands and Islands including voluntary groups.
<ul style="list-style-type: none"> • Include section in diversity guide and in access manual at local stations with regards to considerations associated with 	<ul style="list-style-type: none"> • Copies of the new ACPOS Diversity Booklet will be available in every station and includes a section on 	<ul style="list-style-type: none"> • Identify further opportunities to address public awareness raising 	<ul style="list-style-type: none"> • Northern Constabulary were involved in sponsoring “Highlands R US”, a public celebration of diversity in the Highlands and Islands. • We also held a public

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<p>access of service from adults recovering from or experiencing mental health conditions.</p>	<p>mental health matters.</p>		<p>launch event for the new online reporting system.</p>
<ul style="list-style-type: none"> • Liaise with HUG with regards to review of awareness training. 	<ul style="list-style-type: none"> • A representative of the Highland User Group has been invited to attend our Community Advisory Group meeting. We are also taking forward actions within the Single Equality Scheme with regard to a report about mental health service users and their access to 	<ul style="list-style-type: none"> • Identify method of flagging databases to ensure that large print material is automatically mailed to those that have previously identified as a requirement. 	<ul style="list-style-type: none"> • This is currently undertaken for our Community Advisory Group.

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	police services.		
<ul style="list-style-type: none"> • Work with Deaf Action and Highland Society for the Blind to consider providing awareness training to front line staff 	<ul style="list-style-type: none"> • Being taken forward through the Community Advisory Group and Single equality Scheme. 	<ul style="list-style-type: none"> • Revisit 'message in a bottle' concept initiated by Skye Community Safety partnership. 	<ul style="list-style-type: none"> • This is under review by the Community Planning Partnership.
<ul style="list-style-type: none"> • Review processes for accessing BSL interpreter 	<ul style="list-style-type: none"> • Our policy on accessing interpreting provision is being updated and will include out-of-hours BSL interpreters. In Jul 2009 we entered into a joint agreement with the Highland Community Planning 	<ul style="list-style-type: none"> • Revisit report on access matters for visually impaired in Inverness town centre. 	<ul style="list-style-type: none"> • As above.

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<ul style="list-style-type: none"> Review call management for deaf community 	<p>Partners.</p> <ul style="list-style-type: none"> As highlighted above, we have made our textphone number more widely known through work with Deaf Action, Deaf Services and the Community Safety Officer of Highland Council. 	<ul style="list-style-type: none"> Work with other emergency services to ensure 999 fully accessible. 	<ul style="list-style-type: none"> A national pilot is underway regarding the accessibility of 999 service to members of the deaf community. Any changes resulting from this pilot will be implemented national. Training for call handlers in equality and diversity issues is also planned and contained within our revised disability action plan in the Single Equality Scheme.
<ul style="list-style-type: none"> Review recruitment and retention processes to ensure that appropriate person-centred support is provided. Ensure services of Job 	<ul style="list-style-type: none"> New application forms now complete. Employment related issues are monitored via the Equality and Diversity Progress 	<ul style="list-style-type: none"> Work with other emergency services and Social Work to ensure that information with regards to personal safety equipment is circulated. 	<ul style="list-style-type: none"> Under review by the Community Planning Partnership.

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<p>Centre Plus are utilised in making reasonable adjustments.</p>	<p>Group.</p>		
<ul style="list-style-type: none"> • Take forward a programme of Senior Level awareness raising as a matter of priority 	<ul style="list-style-type: none"> • A Continuing Professional Development Seminar was delivered to middle and senior management in June 2007. 		
<ul style="list-style-type: none"> • Review leaflets and posters to ensure they are 'easy read' together with graphics and pictures to communicate. 	<ul style="list-style-type: none"> • Changes to our website and a number of alternatives formats for public documents are available on request. 	<ul style="list-style-type: none"> • Review joint contract for provision of BSL interpreters and videophones 	<ul style="list-style-type: none"> • Action complete. Deaf Action now holds the contract for BSL interpretation services in the Highland area.

7.0 Additional work undertaken in 2008

In addition to the progress made against the actions set out in our previous annual reports, Northern Constabulary has driven forward additional pieces of work to improve disability equality. A summary of these is contained below.

7.1 Community Advisory Group

We set up a new Community Advisory Group in September 2008 as a primary way to include the views of a range of community, specialist and interest groups in strategic matters of police business. The group continues to meet every second month and have been involved in the creation of the Single Equality Scheme 2009 - 2010. The members representing disability interests are:

Health and Happiness
Highland User Group
Inverness Access Committee

Members have the opportunity to feed into our Single Equality Scheme, raise agenda items and give regular updates about strategic matters facing the groups they represent.

7.2 Hate Free Highland

In collaboration with NHS Highland, Highland Council, Crown Office and Procurator Fiscal Service and Highland and Islands Enterprise, Northern Constabulary have supported the development of an online reporting system for all types of hate incident including disability related hate incidents. There has been in-depth involvement with disabled people at all stages of the development. This included developing advertising material that appealed to and met the requirements of people with disabilities and the second phase involved recruiting organisations and groups who are willing to act as third party reporting centres. The system was launched in May 2009 and December 2009 has been set for the start of the review process. This review will run until March 2010.

8.0 How to contact us

If you would like to comment on this report or provide feedback on any element of our Annual Report, the actions contained in our Single Equality Scheme or would like it in alternative formats, please use any of the options below.

By writing to:

The Strategic Diversity Advisor
Northern Constabulary
Police Headquarters
Inverness
IV2 3SY

By telephone: 01463 720364

By textphone: 01463 723325

By E mailing: executive@northern.pnn.police.uk