



Text highlighted in blue must not be changed

EQUALITY IMPACT ASSESSMENT

The Equality Impact Assessment Standard Operating Procedure/Guidance **must** be used when completing this form:

2

Protective Marking:	Not Protectively Marked	Publication	Yes
Title:	Met Detention EIA		
Branch / OCU:	Met Detention		
Date Created	11/06/14	Review Date:	constant
		Version:	8
Author:	1		

Person completing EIA:	
Signed: 3	Date: 11/06/14
Person supervising EIA:	
Signed: DCI A. Chambers	Date: 28/08/14
Quality Assurance approval:	
Name: S. Fores	Unit Portfolio Planning Date 11/06/14

Decision Making	
Decision Maker:	
Name: Annette Wightman - Met Detention	Rank or Grade: Supt
What is the decision?	
Reject the proposal	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Implement the proposal	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Produce an alternate proposal (if so, a new impact assessment must be completed)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
SMT / (B)OCU/Management Board endorsing decision	

Name:

Rank or Grade:

1. Aims and Purpose of Proposal – see step 1 of the guidance

This EIA seeks to examine the diversity implications and impact on protected characteristics (as defined by the Equality Act 2010), presented by the creation of Met Detention and, makes appropriate recommendations for activity to mitigate any adverse impact. The EIA is undertaken to comply with the general duty (section 149) of the Equality Act 2010 that states that organisations should demonstrate due regard to the requirements of s.149 Equality Act 2010 to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it;
- (c) Foster good relations between persons who share a relevant characteristic and persons who do not share it.

The Metropolitan Police Service (MPS) recognises that specific protected characteristics are disproportionately vulnerable whilst in custody. The EIA will identify these vulnerabilities and outline activity to minimise them. In doing so it will be cognisant of Lord Adebowale's report into the handling of mental ill health incidents by the MPS - as they relate to Met Detention.

Current state i.e. pre - Met Detention

The strategic direction for custody is set by the MD Senior Leadership Team (SLT). The SLT are supported by teams who set policies and professional practice for Permanent Custody Teams (PCT).

Service delivery is through the PCT that are based at each of the thirty 24/7 suites. Each PCT is comprised of a Custody Manager (CM), Custody Officers (CO) and Designated Detention Officers (DDOs). Boroughs with more than one 24/7 suite have been allocated one CM. Their posts are contained within borough establishments and report to a Borough SLT custody lead. This leads to an inconsistent delivery of custody services as Borough SLTs have different interpretations on how custody services should be delivered and adapt the direction, policies and professional practice set by Met Detention.

The LPM has delivered PCTs that work to local demand profiles however, their staffing models have not been designed to be fully resilient. Lack of resilience is particularly acute for times when demand profiles predict lower demand as staffing levels at these times are lowest affecting the ability to grant leave or manage the operational impact of short-notice absence. Resilience is also problematic at weekends when the most Annual Leave is granted by boroughs. Consequently boroughs have to either backfill from other business areas or, choose to operate with PCT numbers below those needed to effectively manage demand.

The Local Policing Model (LPM) has increased the number of Inspectors performing a custody role through the introduction of a new role - the Custody Support Inspector (CSI). CM/CSIs work together in cluster teams to improve the levels of leadership in custody.

With the exception of PFI initiatives at Sutton, Lewisham and Bromley (providing buildings and accredited DDOs), there is no current outsourcing of custody services in the MPS.

Met Detention is responsible for the delivery of Forensic Healthcare Services via an in-house multi disciplinary service of Forensic Medical Examiners (FMEs), Custody Nurse Practitioners (CNPs) and Custody Nurse Practitioner Area Managers.

The estate is managed via a tri-partite arrangement of Met Detention, Property Services and Territorial Policing.

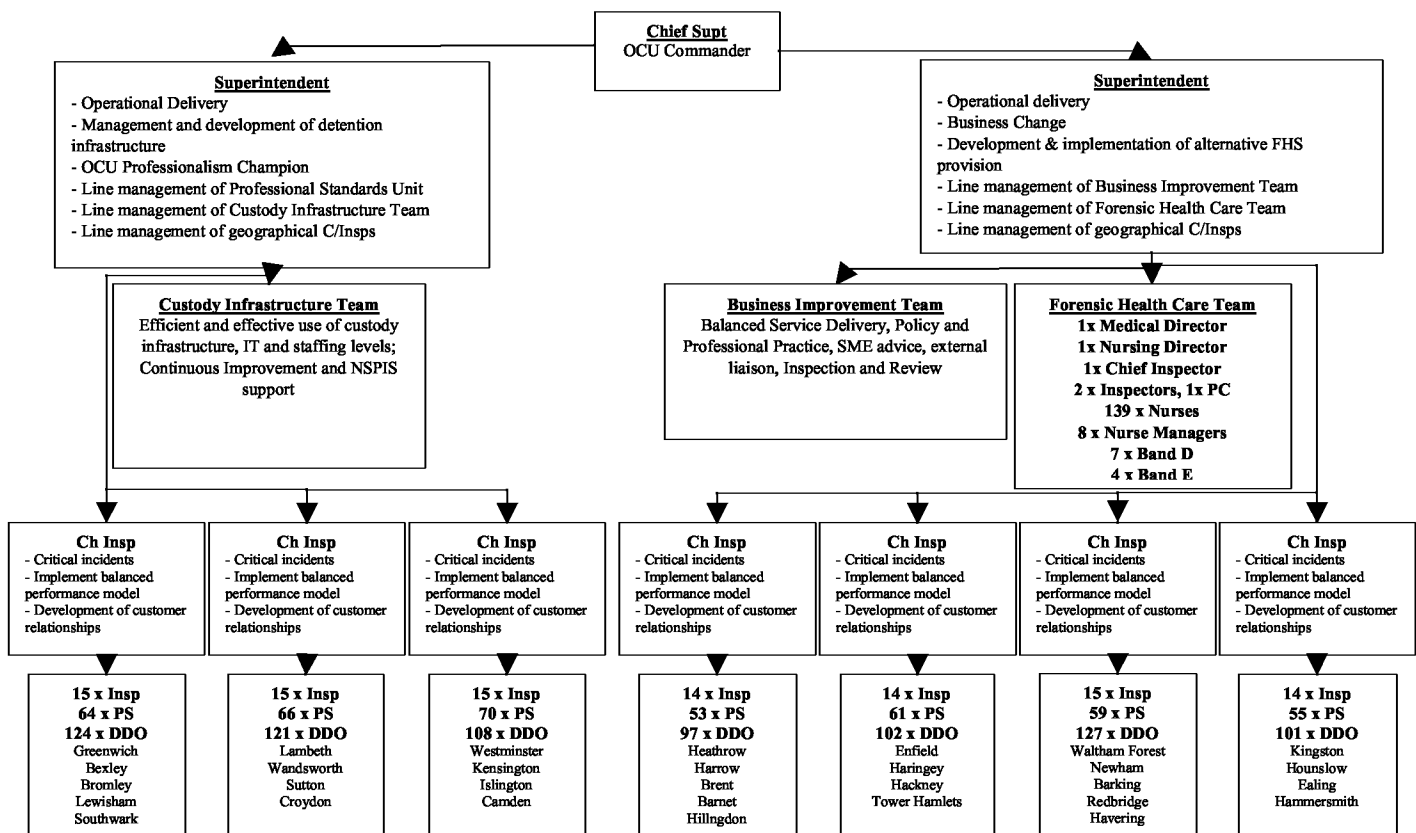
Future State: Met Detention

On October 1st 2013, Management Board approved the development and introduction of a central detention command as part of Met CJ - Met Detention. This centralised model will see the existing Met Detention SLT take line management responsibility for PCTs and for the delivery of custody services.

Met Detention will:

- Ensure that custody services are consistently delivered reflecting legislation, policy and professional practice enabling strategic direction to meet tactical delivery,
- Undertake the NHS Commissioning process,
- Develop and implement a balanced approach to service delivery that takes into account the differing needs of all custody users - particularly those who fall within a protected characteristic and/or are vulnerable, and
- To support its balanced approach to service delivery MD will improve its levels of self-sufficiency and capacity via an uplift of 14 CSI posts, the introduction of corporate 11 and 12 hour shift patterns, minimum staffing levels and the 'flexing' of staff between suites to meet demand.

The diagram below outlines the fully implemented Met Detention Operational Command Unit (OCU) that will be implemented in January 2015.



Following the conclusion of the NHS Commissioning process, a decision will be made as to the future of the Forensic Health Care team.

In addition, Met Detention is developing the provision of a Professionalism Unit and SLT support which will support the OCU.

The Area Chief Inspectors (ACI) will take the lead in identifying and ensuring effective operational responses to diversity issues within their suites.

2. Examination of Available Information – see step 2 of the guidance

The information which help inform this EIA includes:

Service Delivery

- A review of cell occupancy data and custody throughputs,
- Demand led shift pattern options produced by shift pattern analysts,
- Completed Borough Change Implementation Assessments,
- Performance information in relation to custody and investigative processes,
- Implementation interdependencies such as impact on partner agencies (Drug Intervention, Appropriate Adult provision for Adults, Mental Health provision, etc),
- Implementation interdependencies with other MPS Change Projects, and
- Impact of the MPS Estate Strategy

The following information has also been taken into account however further examination of the data is required and will be on going:

- Workforce monitoring identifying the personal characteristics of the current workforce within Boroughs,
- User Satisfaction Surveys,
- Complaints and comments

Information and direction received through consultation - see section 5.

Characteristics of Custody Staff - December 2013

The personal characteristics of members of PCTs and CSIs were captured in a base lining exercise to give a profile of the protected characteristics of Custody staff. Totals do not always add up to the same amount as some staff declined to answer certain questions.

Met Detention has gathered the data on protected characteristics that NSPIS allows. There is no ability to search for gender reassignment, marriage and civil partnerships, pregnancy and maternity or sexual orientation.

Any other Asian background	8	Female	367	Agnostic	5
Any other Black background	6	Male	820	Atheist	5
Any other group not specified	5			Baptist	5
Bangladeshi	10	<20	7	Christian	69
Black - African	45	20-24	136	Christian Orthodox	2
Black - British	31	25-29	167	Church of England	201
Black - Caribbean	27	30-34	125	Church of Scotland	7
Chinese	2	35-39	132	Church of Wales	2
Greek & Greek Cypriot	6	40-44	181	Greek Orthodox	1
Indian	39	45-49	223	Hindu	3
Mixed - Any other mixed background	13	50-54	154	Humanist	1
Mixed - White & Asian	10	55-59	42	Islam	6
Mixed - White & Black African	1	60+	10	Jehovahs Witness	1
Mixed - White & Black Caribbean	7	Full Time	1159	Jewish	3
Not stated	10	<0.5	6	Methodist	5
Pakistani	17	0.5-0.7	11	Pentecostal	1
Turkish & Turkish Cypriot	6	>0.7	22	Presbyterian	2
White - British	861	Disabled	9	Protestant	7
White - Irish	18			Roman Catholic	55
White - Other	43			Salvationist	1
				Sikh	7
University Degree	138			Spiritualist	1

DDO		<20	20-24	25-29	30-34	35-39	40-44	45-49	50-54	55-59	60+
M	414	5	79	99	52	26	44	40	34	25	5
F	288	2	57	67	39	34	28	19	20	7	3

SGT		<20	20-24	25-29	30-34	35-39	40-44	45-49	50-54	55-59	60+
M	341	0	0	1	22	53	82	108	62	6	2
F	73	0	0	0	12	17	14	25	3	0	0

INSP		<20	20-24	25-29	30-34	35-39	40-44	45-49	50-54	55-59	60+
M	55	0	0	0	0	1	8	25	14	4	0
F	5	0	0	0	0	0	1	3	2	0	0

Characteristics of MPS Detainees - December 2013

NSPIS again present data problems Met Detention has gathered the data on protected with no opportunity to search on disability, gender reassignment, pregnancy and maternity race , religion and belief or sexual orientation.

The data for Mental Health is likely to have inaccuracies. During the initial Risk Assessment detainees are asked whether they suffer from Mental Health conditions. It is the answer to this question that generates the NSPIS data. Under reporting during the risk assessment may be an issue. Moreover, if it becomes apparent following the initial Risk Assessment that a detainee is suffering from a Mental Health condition, this cannot be collected for statistical purposes. This can be a common occurrence when a detainee initially presents as being affected by alcohol and/or substance misuse and a Mental Health condition subsequently becomes apparent when the impact of the alcohol etc reduces.

	Gender		MH Problems	Age of detainee					
	M	F		<18	19 - 29	30 - 39	40 - 49	50 - 59	>60
Custody Suite									
Acton	87%	13%	12%	12%	37%	26%	15%	6%	2%
Barking	87%	13%	14%	17%	40%	24%	14%	4%	1%
Bethnal Green	88%	12%	15%	16%	42%	24%	12%	4%	1%
Bexleyheath	84%	16%	18%	17%	39%	21%	15%	5%	2%
Brixton	86%	14%	17%	15%	35%	23%	16%	7%	2%
Bromley	83%	17%	21%	17%	35%	21%	16%	6%	2%
Charing Cross	84%	16%	13%	9%	43%	25%	14%	6%	2%
Chiswick	86%	14%	18%	12%	34%	27%	16%	7%	3%
Colindale	87%	13%	16%	14%	37%	23%	15%	6%	2%
Croydon	85%	15%	17%	19%	39%	21%	14%	5%	2%
Edmonton	86%	14%	14%	16%	36%	24%	15%	6%	2%
Forest Gate	87%	13%	13%	17%	39%	23%	14%	4%	1%
Hammersmith	84%	16%	15%	15%	35%	23%	17%	7%	2%
Harrow	86%	14%	13%	14%	39%	23%	13%	7%	2%
Heathrow	87%	13%	10%	3%	32%	28%	19%	12%	4%
Holborn	86%	14%	18%	10%	38%	24%	17%	7%	2%
Hounslow	85%	15%	15%	18%	40%	22%	12%	5%	2%
Ilford	86%	14%	13%	15%	40%	24%	13%	5%	2%
Islington	86%	14%	18%	16%	37%	22%	16%	6%	2%
Kentish Town	88%	12%	17%	16%	39%	22%	14%	6%	2%
Kingston	86%	14%	19%	16%	40%	19%	15%	7%	2%
Lewisham	84%	16%	19%	16%	36%	22%	16%	6%	2%
Leyton	86%	14%	13%	15%	40%	24%	14%	6%	1%
Limehouse	86%	14%	15%	13%	38%	28%	13%	5%	1%
Notting Hill	84%	16%	17%	10%	38%	24%	17%	8%	3%
Paddington	86%	14%	13%	13%	37%	24%	14%	9%	2%
Plumstead	84%	16%	20%	15%	37%	23%	15%	6%	2%
Romford	85%	15%	17%	17%	41%	21%	13%	5%	2%
Shoreditch	87%	13%	14%	15%	38%	24%	15%	6%	2%
Stoke Newington	86%	14%	19%	14%	36%	25%	16%	7%	2%
Sutton	83%	17%	18%	16%	39%	22%	15%	5%	2%
Uxbridge	87%	13%	17%	15%	39%	23%	14%	6%	2%
Walworth	86%	14%	16%	16%	36%	23%	16%	6%	2%
Wandsworth	85%	15%	16%	15%	36%	23%	15%	7%	2%
Wembley	88%	12%	13%	16%	37%	24%	14%	6%	2%
West Drayton	86%	14%	15%	10%	41%	25%	15%	6%	1%
Wood Green	83%	17%	16%	13%	37%	20%	19%	6%	2%

	Self Defined Ethnicity														
Custody Suite	A1	A2	A3	A9	B1	B2	B9	M1	M2	M3	M9	O9	W1	W2	W9
Acton	14%	4%	0%	8%	9%	10%	4%	2%	1%	1%	2%	2%	21%	4%	17%
Barking	4%	5%	5%	3%	6%	12%	4%	2%	1%	0%	1%	2%	33%	1%	19%
Bethnal Green	1%	1%	32%	3%	5%	8%	3%	3%	1%	0%	2%	2%	25%	1%	10%
Bexleyheath	2%	0%	0%	2%	2%	8%	3%	1%	1%	0%	1%	1%	69%	1%	6%
Brixton	1%	1%	1%	2%	19%	13%	12%	3%	1%	0%	3%	4%	21%	2%	13%
Bromley	1%	1%	1%	2%	8%	5%	6%	2%	0%	0%	2%	2%	61%	2%	7%
Charing Cross	2%	2%	2%	5%	5%	9%	6%	1%	1%	0%	2%	11%	22%	2%	25%
Chiswick	10%	4%	1%	8%	5%	7%	4%	2%	1%	1%	2%	2%	36%	2%	15%
Colindale	3%	2%	1%	6%	5%	10%	4%	2%	1%	0%	2%	4%	33%	3%	21%
Croydon	2%	2%	1%	4%	16%	10%	8%	5%	1%	0%	2%	2%	34%	1%	9%
Edmonton	1%	1%	1%	3%	10%	13%	7%	2%	1%	0%	2%	4%	29%	2%	21%
Enfield	1%	0%	1%	2%	9%	13%	5%	3%	0%	0%	0%	4%	35%	3%	20%
Forest Gate	5%	8%	9%	5%	8%	16%	6%	2%	1%	0%	2%	2%	18%	1%	16%
Hammersmith	2%	2%	1%	3%	12%	11%	6%	4%	1%	1%	2%	3%	29%	3%	14%
Harrow	8%	3%	1%	13%	7%	10%	4%	2%	1%	1%	2%	3%	26%	4%	13%
Heathrow	8%	5%	2%	7%	3%	14%	4%	0%	0%	0%	1%	8%	17%	2%	25%
Holborn	1%	2%	5%	3%	4%	10%	4%	2%	2%	1%	2%	3%	32%	4%	17%
Hounslow	11%	5%	1%	7%	4%	8%	3%	2%	1%	1%	1%	2%	33%	2%	18%
Ilford	9%	9%	4%	6%	7%	9%	3%	2%	1%	1%	1%	3%	24%	1%	17%
Islington	1%	1%	2%	2%	9%	9%	6%	4%	1%	1%	2%	3%	36%	4%	13%
Kentish Town	1%	1%	3%	2%	5%	12%	4%	3%	1%	0%	2%	4%	35%	5%	14%
Kingston	2%	2%	1%	5%	3%	5%	2%	2%	1%	1%	1%	2%	54%	2%	12%
Lewisham	1%	1%	1%	3%	17%	14%	11%	5%	1%	0%	2%	2%	31%	2%	8%
Leyton	3%	8%	3%	5%	8%	10%	7%	2%	1%	0%	2%	3%	21%	1%	22%
Limehouse	1%	2%	36%	2%	5%	7%	3%	2%	1%	0%	2%	2%	26%	1%	7%
Notting Hill	1%	1%	1%	4%	8%	9%	4%	4%	1%	1%	3%	8%	29%	2%	15%
Paddington	3%	2%	4%	5%	9%	9%	5%	1%	1%	0%	3%	11%	21%	1%	21%
Plumstead	1%	1%	1%	3%	5%	15%	8%	2%	1%	0%	2%	2%	45%	2%	9%
Romford	2%	1%	1%	1%	3%	6%	3%	2%	1%	0%	1%	1%	65%	1%	11%
Shoreditch	2%	1%	7%	3%	10%	11%	11%	3%	1%	0%	2%	5%	23%	3%	15%
Stoke Newington	2%	1%	3%	2%	14%	12%	11%	3%	1%	0%	3%	4%	22%	3%	15%
Sutton	2%	1%	1%	4%	5%	6%	3%	3%	1%	0%	2%	2%	55%	2%	10%
Uxbridge	10%	4%	1%	6%	5%	8%	3%	2%	0%	1%	1%	1%	45%	3%	7%
Walworth	1%	1%	1%	2%	11%	19%	8%	3%	1%	0%	2%	4%	28%	2%	11%
Wandsworth	2%	3%	1%	4%	11%	8%	7%	4%	1%	0%	2%	3%	31%	2%	17%
Wembley	6%	3%	1%	7%	14%	14%	6%	2%	1%	1%	2%	3%	13%	4%	17%
West Drayton	14%	3%	1%	4%	4%	10%	2%	1%	1%	1%	1%	2%	39%	3%	14%
Wood Green	1%	1%	0%	1%	12%	14%	5%	3%	0%	0%	1%	2%	19%	5%	24%

A1	Asian - Indian	M2	Mixed - White and Black African
A2	Asian - Pakistani	M3	Mixed - White and Asian
A3	Asian - Bangladeshi	M9	Mixed - Other
A9	Asian - Other	O1	Other - Chinese
B1	Black - Caribbean	O9	Other - Any Other Ethnic Group
B2	Black - African	W1	White - British
B9	Black - Other	W2	White - Irish
M1	Mixed - White and Black African	W9	White - Any Other White Background

Again, Met Detention has gathered all the information that NSPIS provides for detainee's. There is no ability to search for

The Diversity and Citizen Focus Directorate (DCFD) have assessed the suitability of 21 suites to support disabled and Muslim detainees, and Transgender detainees/staff. The findings were:



Inspection Master
list.xls (62...

Development of future Protected Characteristic information

Met Detention recognises the need to develop more sophisticated data regarding a fuller range protected characteristics for both its workforce and for detainees. This is necessary to allow a greater understanding of issues such as:

- The potential impact of tactics such as PCR (street charging of cannabis). A potential impact is that non-English speakers would be less likely to be offered this and more likely to be taken into custody, or

The increasing recruitment of Police Officers from DDOs may result in changes to the protected characteristic profile of DDOs. Met Detention also recognises the need to develop faster time information to understand and manage real-time and on-going risk connected to vulnerability via a Met Detention Grip and Pace process. For example, an understanding of the number of juveniles arrested and detained daily together with the number of successful s38 PACE applications - transfer of juveniles to alternative local authority accommodation when bail is refused.

3. Screening Process for relevance to Diversity and Equality issues – see step 3 of guidance

Does this proposal have any relevance to:

a)	Age	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
b)	Disability	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
c)	Gender	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
d)	Gender Reassignment	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
e)	Marriage and Civil Partnership (employment only)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
f)	Pregnancy and Maternity	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
g)	Race	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
h)	Religion or Belief	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
i)	Sexual Orientation	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
j)	Other Issues	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

4. From the answers supplied, you must decide if the proposal impacts upon diversity or equality issues. If yes, a full impact assessment is required.

Full Impact Assessment Required?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
----------------------------------	-----	-------------------------------------	----	--------------------------

5. Consultation / Involvement – see step 5 of the guidance

Who was consulted?

1st consultation

S.A.M.U.R.A.I.;

The Federation Sgts Branch Board, Inspectors Branch Board & Supt association.

DoR

TP - Met Detention Team

TP - Met Detention SLT

TP – Met Detention Business as usual team

All current custody inspectors

Met Prosecutions

Digital Policing

DCFD

HQ Directorate of Media & Communication

Met Change team

MET-TUS SECRETARIAT

TP Criminal Justice

TPHQ ACPO

DoR (FinanceServ)

TP - C&S

Met Detention project board critical readers

HQ Property Services Directorate

2nd consultation

Association for Muslim Police (AMP) -⁴

Jewish Police Association (JPA) ⁵

Gay Police Association (GPA) -

Black Police Association (BPA) -

Date and method of consultation

The EIA has been sent twice by e-mail to a wide range of stakeholders requesting feedback - as per the above schedule.

Met Detention Area Chief Inspectors have consulted locally to identify access issues to suites affecting disabled users.

DCI Chambers met with CS Bourlet (who is attached to the NHS undertaking Commissioning work) to discuss vulnerability resulting from Mental Health and Learning Difficulties.

On 11/9/14 the EIA was authorised by the OCU commander to be used for internal use and to proceed to external consultation.

Where are the consultation records stored?

Met Detention project team email folders.

Give a brief summary of the results of the consultation / involvement? How have these affected the proposal?

E-mail consultation resulted in feedback from 4 stakeholders. This is reflected in the EIA.

Access issues are being considered by the Met Detention project team and Property Services Directorate.

The Disability section of the EIA reflects the discussion with DCS Bourlet.

6. Full Impact Assessment – see step 6 of the guidance

Explain the potential impact (whether intended or unintended, positive or negative) of the proposal on individuals or groups on account of:

Age

Potential Workforce Impacts

If the age and length of service data indicates high percentages of officers approaching 30 years service, consideration needs to be given to the potential risk of future implementation of A19 (current legal and HR advice is that this is unlikely, but is included for completeness and to demonstrate consideration of the issue) and the potential loss of workforce members and skills mix. Retirement arrangements and provision are in the process of being revised taking account of recent changes in legislation under the Equality Act 2010 abolishing the statutory retirement age of 65. This may lead to a greater age mix of employees within custody.

Shift working (particularly nights) can have a damaging affect on health and performance and may increase risk when travelling to or from work. It may impact on those with caring responsibilities - both positively and negatively.

All age ranges maybe affected by shifts although older staff maybe more adversely affected. Age was a specific concern for the Inspectors Branch board as their members tend to be older and 11 hour shifts may affect them more.

Mitigation

Further analysis to identify whether there is a potential risk to numbers and the skills/age mix of our workforce.

Met Detention has put in place safety control measures to assist and reassure staff. These include:

1) The development of shift patterns whereby a number of posts in each role will not have to work 11/12 hour shifts or night duties. These shifts may be of particular use for Inspectors and Sergeants due to the relative ages of the staff in these positions. They are however, also available for DDOs as well.

Inspectors - 8 will not need to work 11 hour shifts or ND, a further 45 will not need to work ND (45%)

Sergeants - all will need to work 12 hour shifts, 44 will not need to work ND (10%)

DDOs - 36 will not need to work 12 hour shifts or ND, an additional 4 will not need to work ND (5%)

2) Met Detention Area Chief Inspectors are working with boroughs to review all applications for Flexible Working Patterns (FWP) (including job sharing) in advance of go-live. These applications will be considered at a Met Detention FWP panel prior to go-live. The panel will look across all suites to see if an application that can't be supported in one suite can be supported in others. Work is under way with Human Resources to improve the current process for recording FWP to allow more effective identification of job sharing opportunities across suites.

Possible External Impacts

Met Detention has a responsibility for cooperating with arrangements to improve the well-being of juveniles with regards to their physical and mental health and, to protect them from harm. Specifically:

- After an interview or other custody related interaction, the custody officer should explicitly ask if any safety or welfare issues were raised regarding the juvenile,
- If neither the arresting or investigating officer are on duty when it becomes apparent that a Pre-Assessment Checklist (PAC) is required for a juvenile, the custody officer must direct another officer to complete the PAC and communicate this to the appropriate agency,
- The custody officer must provide Appropriate Adults (AA) with key information contained in the juvenile's detention log and risk assessment,
- When juveniles are released from custody suites which are a significant distance away from where they were arrested or, where the custody suite is situated away from local transport links, this will be managed by the Custody Officer as part of their Pre Release Risk Assessment, and
- If bail is refused for a juvenile then attempts must be made to obtain alternative Local Authority (LA) accommodation unless it is impracticable to do so.

Boroughs have established individual arrangements with their LA to provide AA services. This has led to inconsistent service delivery.

In the future there maybe further reductions in the number of 24/7 custody suites leading to juvenile detainees being taken to suites not on their LA area.

Mitigation

Met Detention will develop information that can be used to ensure that its SLT can effectively review compliance with activity that will ensure the well being of juvenile detainees. Professional Development Days (PDD) will be used to reinforce these requirements.

Met Detention is reviewing the provision of AA support for juveniles to identify gaps in the provision of this service.

Met Detention will ensure that consultation is undertaken with LA to minimise the impact of any future estate change on the provision of AA services.

Disability

Potential Workforce Impacts

There is a historical reluctance for members of staff to self-declare as disabled on Met HR.

Certain disabilities **may** affect the ability of staff with certain disabilities to undertake specific tasks or work nights and/or shifts. The actual impact of these disabilities **on individuals** must be properly understood and managed.

Mitigation

Met Detention will develop a strategy to:

- 1) Increase the confidence of disabled staff to declare their conditions and,
- 2) Increase awareness of and competency in managing Disability amongst its leaders.

When disabilities have been identified a 'tailored adjustments agreement' must be developed leading to appropriate reasonable adjustments.

Potential External Impacts

There is no such legal requirement for LA to provide AA support for vulnerable adults in the same way as for juveniles. This is currently dealt with on an individual borough basis leading to inconsistent service delivery.

Many detainees are vulnerable when affected by Mental Health issues, Learning Difficulties, Alcohol and/or substance misuse, and social issues such as homelessness. This can lead to self-harm, deaths in or following detention/contact and suicide following police custody.

The taking of people who need immediate access to critical Mental Health support to custody facilities using S136 puts them into an environment that can make their issues worsen.

New build or recently refurbished custody suites are largely accessible to users with physical disabilities. However, some older custody suites (particularly those in police stations built in the last century e.g. Kentish Town & Notting Hill,) are not suitable for users in wheelchairs - even on a short term basis.

Again, the facilities **within** new build or recently refurbished suites are largely accessible to users with physical disabilities. Facilities include:

- Doorways are wide enough to accommodate a standard size wheelchair,
- Low level assistance call buttons and low level wash basins,
- Cells with clear fronted doors for vulnerable / claustrophobic detainees,
- Disabled showers & toilets, and
- Discrete Charge Rooms that incorporate low level counters to allow privacy for sensitive matters that are accessible to wheelchair detainees.

However, there are areas within new builds that need further development to support wheelchair users including:

- Interview and Consultation rooms need tables that have a fixed underside height with a gap that is sufficient to allow a wheelchair user, detainee or legal representative, to sit at the table in the same manner as an able bodied person and,
- Photographic rooms need to be redesigned to allow wheelchair users access to the camera.

Mitigation

Met Detention is reviewing the provision of AA support for vulnerable adults to support LAs provide this service to a more consistent standard.

The MPS has already undertaken significant work in safeguarding detainees through initiatives designed to improve both initial and pre-release risk assessments and, to ensure the safe hand-over of detainees to relatives, carers or professionals in-line with recommendation 18 of Lord Adebowale's report. It is introducing Liaison and Diversion Mental Health nurses in all suites to assist in-custody care and the effective pathway of vulnerable detainees to Mental Health and Learning Difficulties support in-line with recommendation 17 of Lord Adebowale's report. Met Detention will build on this developing specific safeguarding guidance and integrated health

pathways to support a wide range of vulnerabilities.

It will develop a culture whereby assumptions are not made about challenging or unusual behaviour. Rather these will be seen as triggers to consider vulnerability. Staff will be trained in the use of the Vulnerability Assessment Framework (reflecting the National Decision Making model,) and the Newcastle Risk Assessment tool introduced in-line with recommendation 19 of Lord Adebawale's report. A dedicated Suicide Prevention & Intervention Strategy officer has been employed to develop an in custody suicide reduction strategy.

Inspections carried out by the Met Detention Professionalism Unit will focus on risk and vulnerability reviewing:

- Pre-release Risk Assessments
- Strip Searches
- Compliance with 4Rs
- Supervision and enforcement of standards
- Management of alcohol dependant detainees and those under the influence
- Vulnerable detainees

The MPS and partners are working towards S136 detentions in custody being a never event. It is already a never event for children. The number of adults detained is very low compared to the overall number of detainees and is falling. Between January 2013 and December 2013 87 adults were detained in MPS custody suites via S136. Between January 2014 and July 2014 16 adults were thus detained.

Met Detention has reviewed the accessibility of each suite to disabled users. Any necessary improvements will be undertaken in conjunction with Property Services Department. The Met Detention implementation project team will:

- Map custody resources to the disability provisions of the Equality Act and provide information to Met CC so that they can ensure that wheelchair users who have been arrested are only taken to custody suites that are Equality Act 2010 - Disability compliant and,
- Ensure that future estate development complies with the Equality Act 2010.

Met Detention will review the accessibility of all facilities **within** suites for disabled users.

Sex

Potential Workforce Impacts

The impact of gender specific conditions e.g. menopausal changes affecting women has not been fully evaluated.

Met Detention acknowledges the need to develop strategy to increase the number of female staff.

Carer responsibilities are predominantly connected to children. Although male staff undertake the carer role these are normally disproportionately performed by female staff. This is particularly the case for CNP who are mainly female with a high % having carering responsibilities.

Potential External Impacts

Not fully evaluated

Gender Reassignment

Potential Workforce Impacts

No data is gathered regarding whether a member of staff is transgender.

Gender reassignment is a very sensitive issue that has parallels to disability - particular staff with mental health conditions or learning difficulties.

Consideration needs to be given to what functions reassigning staff can undertake e.g. searching during reassignment.

Mitigation

Met Detention will develop a strategy to:

- 1) Increase the confidence of transgender and reassigning staff to declare, and
- 2) Increase awareness of and competency in managing transgender and reassigning amongst its leaders.

Potential External Impacts

Generally custody officers and DDOs spoken to by DCFD had a very poor knowledge of transgender and reassignment matters.

This may affect the ability of Met Detention staff to deal with transgender and reassigning detainees appropriately.

Mitigation

On each visit the DCFD Inspection Team supplied transgender tool kits specifically aimed at custody officers and DDOs/searching officers.

These toolkits are available on the DCFD website. Met Detention will ensure that they are incorporated within their own toolkits.

Transgender and reassigning awareness training will be incorporated within Met Detention training.

Marriage and Civil Partnership (employment only)

<p>Potential Workforce Impacts</p> <p>No impacts identified.</p>
<p>Pregnancy and Maternity</p> <p>Potential Workforce Impacts</p> <p>Appropriate risk assessments will need to be undertaken for staff who are pregnant</p> <p><u>Mitigation</u></p> <p>Met Detention will comply with MPS guidance on the management of staff that are pregnant or are on maternity leave.</p> <p>Safety control measures including flexible working, no contact with detainees and change of role will be implemented.</p> <p>Potential External Impacts</p> <p>Issues regarding the provision of childcare if a person with children is detained in custody.</p> <p><u>Mitigation</u></p> <p>Met Detention will review its toolkits to ensure that they provide appropriate guidance to support detainees that are pregnant or, were arrested with children and/or who have caring responsibilities for a child elsewhere.</p>
<p>Race</p> <p>Potential Workforce Impacts</p> <p>Not fully evaluated although the disproportionately low numbers of BME members of staff within Met Detention has been acknowledged.</p> <p>Potential External Impacts</p> <p>The Self Defined Ethnicity of detainees shows distinct variations across London boroughs.</p> <p>Current MPS custody systems do not allow for the monitoring of Race, this is being considered during the discussions around the replacement system.</p> <p><u>Mitigation</u></p> <p>MPS custody suites already have protocols in place to ensure that people of different ethnicities can be appropriately cared for. Met Detention will review these prior to go-live.</p> <p>ACI will take on the responsibility for consultation with local communities regarding custody services and for ensuring that their diverse communities receive the appropriate service.</p>
<p>Religion and Belief</p>

Potential Workforce Impacts Allowing staff working patterns so that they may observe religious events, or fulfil daily obligations regarding their faith/ belief may affect operational delivery.

Mitigation

Although meeting operational demand by having the correct number of staff on-duty takes precedence, there is a large body of guidance available as to how reasonable adjustments can be made to support the religious and/or faith/belief needs of staff.

Potential External Impacts

DCFD found that generally good selections of articles concerned with religious observance were found in the majority of the custody suites that they visited. Detainees were always allowed to carry out ritual cleansing before prayer and were often permitted to pray outside of their cells.

Two areas identified for improvement were:

- 1) No fixed/prominent signs indicating the direction of Mecca, and
- 2) Arabic versions of the Qur'an weren't stored or handled correctly

Mitigation

As is current practice, consideration will be given to ensuring that provision is made for dietary variation and for religious observance in line with existing guidance for detainees in the Met Detention tool kit.

Wherever possible, Met Detention staff will take religious and faith/belief considerations when undertaking a Pre-Release Risk Assessment. For example not allowing an Orthodox Jew sufficient time to travel home before the Sabbath comes in would mean that person was stranded and unable to travel without breaking the rules of their faith. s?

Met Detention will deliver the following:

- A consistent method will be implemented across all Met Detention suites to indicate the direction of Mecca. A Qibla will be stencilled on the ceiling of all cells and/or the cell corridor,
- Localised responses will be developed with the Beth Din (Jewish Court) to support the release of Orthodox Jews - taking into account future estate developments,
- All Qur'an's in Arabic will be replaced by a dual English/Arabic language version negating the need for special handling & storage conditions.
- If the custody kitchen area has more than one microwave then one should be set aside to reheat halal, vegetarian & kosher meals
- Partnership agreements in place with a local Rabbi for kosher food to be brought in as and when required.

- Clearly communicating to detainees that prayer mats and religious material are available on request.
- A separate fridge to be used to store Kosher food away from non Kosher food. The need for this will decrease as Met Detention moves towards ambient meals that will not require fridge storage,
- Met Detention will work with Staff Associations to arrange appropriate training events and ensure that its toolkit offers sufficient guidance.

Sexual Orientation

Potential Workforce Impacts

Information on the sexual orientation of our workforce is available through the MetHR confidential screen however, disclosure rates are low.

Mitigation

Met Detention will develop a strategy to:

- 1) Increase the confidence of staff of all sexual orientations to declare, and
- 2) Increase awareness of and competency in managing sexual orientation issues amongst its leaders.

Potential External Impacts

Not fully evaluated

7. Monitoring – see step 7 of the guidance

a) How will the implementation of the proposal be monitored and by whom?

Each ACI will be responsible for identifying and addressing operational issues regarding protected characteristics on their area.

The Met Detention Diversity lead will establish a working group to look at protected characteristics, information gathering and training across the OCU.

Diversity will be a standing agenda item for the Met Detention SLT meeting allowing the OCU Commander to monitor issues brought to the meeting by the ACI and Diversity lead.

b) How will the results of monitoring be used to develop this proposal and its practices?

The Met Detention Diversity Lead will use the monitoring process to review progress in developing proposals.

c) What is the timetable for monitoring, with dates?

The Met Detention Diversity lead will update and re-publish the EIA on a 6 month basis.

8. Public Availability of reports / result – see step 8 of guidance

What are the arrangements of publishing, where and by whom?

Full EIA will be published externally on the Met Detention web pages.

MP 63/11