

# **MAYOR OF LONDON**

OFFICE FOR POLICING AND CRIME

## **EQUALITY IMPACT ASSESSMENT**

# Aims and purpose of the proposal / policy

This Equality Impact Assessment sets out the impact of the joint Metropolitan Police Service (MPS) and the Mayor's Office for Policing and Crime (MOPAC) Public Access Strategy. Through this strategy the MPS and MOPAC have agreed to reduce the number of police station front counters across London from 73 front counters to 32, 24 hours a day, 7 days a week counters and four additional day time officer-led front counters including two new ones at Church Street to replace the front counter at Paddington Green and in Kensington and Chelsea to respond to the specific needs of the local community around the Grenfell tower site, dependant on local views.

We will re-consult locally on the future of the daytime, volunteer-led front counters at Ruislip and Pinner.

#### Introduction / Background:

As part of Public Access Strategy the MPS is redesigning how the organisation interacts with the public, reducing the number of buildings in its estate in order to reduce associated running costs, and raise capital receipts. This includes a new public digital offering in the MPS website. Front counters will remain a key part of our Estate and Public Access Strategy and we intend to improve how this service is provided.

The main route for contacting police, particularly in an emergency, has long been the telephone, with the MPS receiving from four and a half to five million calls a year from the public. Most people still see the phone as their preferred channel for contacting police and other 999 services when they have an emergency, and 70% of all crimes are reported over the phone.

The Public Access Programme, being delivered by the MPS and MOPAC, is seeking to identify ways of improving efficiency, to deliver better quality customer service and reduce unnecessary costs. The aim of this programme is to take a customer service based approach to reviewing the methods of public access to policing services in order to make improvements through the provision of both face to face and remote access channels at times and locations that are more closely aligned to demand.

The Public Access Strategy has been developed and includes the development of public access channels through telephony, digital engagement and face-to-face access.

Face-to-face contact channels:

- 1. Access via the police estate (i.e. through the remaining 24/7 front counters in each borough and additional daytime counters)
- 2. Access via Community Contact sessions (i.e. surgeries/public meetings)
- 3. Access through the deployment of police officers to the individual (response to incidents, appointments, officers on patrol etc.)

To identify what these changes could mean for communities, it has been necessary to establish minimum standards for front counter provision on each borough. These minimum standards comprise of:

- Core service commitment
- Criteria for 24/7 front counter provision

The minimum standards are the basic front counter provision for each borough, including 24-hour availability, location and facilities.

Proposed Principles of Change:

- 1. The MPS and MOPAC have developed a Public Access Strategy making changes to public access to policing services.
- 2. Service delivery through front counters should be seen in the wider context of public access to policing services. Provision is determined using a proposed minimum standard for all Boroughs. The fundamental criteria will be a core service commitment for each Borough to have a 24/7 front counter, which will be accessible, helpful and appropriately staffed
- 3. The minimum standards and additional criteria for front counter with a minimum commitment of 32 front counters, one per borough, providing a 24/7 service and four additional day time officer-led front counters. We are proposing two additional front counters, one at Church Street in Westminster and one near the Grenfell Tower site in Kensington and Chelsea.
- 4. The MPS is guided by the need to make savings in its budget as well as deliver customer service improvements, both of which are key objectives of the MPS.

From 14th July 2017 MOPAC and the MPS ran a public consultation process on the Public Access and Engagement Strategy, which set out proposed changes to front counters and future Public access delivery. A draft EIA was published along with these proposals, and feedback from the process has been incorporated in the development of this document.

Sci	Screening process for relevance to diversity and equality issues						
Each "protected characteristic" in Section 5 has guidance as to what implications / issues you may need to consider.							
Does this proposal / policy have any relevance to:		Internal, relevant to staff / or working practices	External, relevant to service delivery	Not relevant to either			
Α	Age	Yes	⊠ Yes	□No			
В	Deaf and disabled / Disability	☐ Yes	⊠ Yes	□No			
O	Gender Reassignment	Yes	⊠Yes	□No			
О	Marriage and Civil Partnership (employment only)	☐ Yes	☐ Yes	⊠ No			
П	Pregnancy and Maternity	Yes		□No			
F	Race	Yes	⊠ Yes	□No			
G	Religion or Belief	Yes	⊠ Yes	□No			
I	Sex	☐ Yes	⊠ Yes	□No			
I	Sexual Orientation	Yes	⊠ Yes	□ No			
J	Other Issues	Yes		□No			

## **Examination of available information**

Footfall to front counters has continued to fall, from 1.2 million visits in 2011, to a projected 575,000 in 2017 based on the current trend. Due to the reduction in footfall, the MPS will concentrate on providing a better service in fewer locations, which are more victim and customer focused which will allow us to come out of buildings we no longer require for operational reasons allowing us to make savings in running costs and raise capital receipts.

The majority of contact with the MPS takes place on the telephone. In an emergency, the best way to contact the police will always be to dial 999. These calls are taken by both police staff and police officers within the First Contact team, based at a number of central locations. The MPS Contact Centre (MetCC) is staffed 24hrs a day, 365 days a year by over 1,700 members of staff, with First Contact taking the initial calls from the public

and despatch allocating the calls to officers on patrol to attend these calls.

The MPS receives on average 6,500 emergency calls per day and the current response for answering emergency calls is within 10 seconds 70% of the time. Calls are graded on a scale of how urgent they are, with targets across the MPS for how quickly they should be responded to.

The non-emergency 101 number was introduced in London in July 2011 and now makes up about two-thirds of the MPS' total call volume – approximately 8,500 a day. A small number of these calls are escalated to emergencies by the MPS' 1,700 call-handlers, and the rest contain a huge variety of requests for service, not all of which are police matters. With call-handlers available 24/7, 101 can sometimes be a service of last resort for people with a problem to solve. According to surveys of people accessing policing services, public satisfaction with first contact with the MPS is generally high.

The MPS has a commitment to answer 101 calls within 30 seconds 90% of the time and, as with 999 calls, the seriousness of the matter is considered before a decision is taken about how best to respond. A risk assessment framework is used to identify how best to respond. Prioritisation is based on threat, harm, risk, and vulnerability with factors such as investigative opportunities also taken into consideration.

101 calls cost 15p, which is a fixed price no matter how long the duration of the call or what type of device is calling. 999 calls, of course, are free and calls can be made from mobile phones which have no credit.

Average wait times were over three minutes (184 seconds) in September and 22% were answered within 30 seconds, against a target to answer 90% of calls within 30 seconds.

The poor performance of 101 has been driven by the increasing demand for the 101 services – up 4% since July 2016. This trend has also been the case in other forces nationally. Based on current estimates, it is believed that call volumes will exceed 6 million for the year 17/18 for the first time. This increase in demand has been exacerbated by high vacancy rates in the Met Control Centre, along with high levels of sickness.

The MPS are introducing an improvement plan to increase performance and reduce waiting times. This plan includes increasing recruitment, with new staff starting shortly; addressing the high levels of sickness; and reducing the demand on the system by exploring ways to divert those people currently using 101 for non-policing activity to other sources of information and help.

While this plan is now in place, it will take some months before the unit is up to full strength and the suite of measures have the required effect. The MPS and MOPAC will continue to monitor performance going forward.

As part of our public access commitments, we are offering alternative methods by which the public can contact us by making current front counter services available online. Some customers have already started to use online services through the provision of the new MPS website.

March 2017 saw the launch of the new MPS website. Since then there has been a 20-fold increase in online transactions, with 20,000 reports/applications being received a month. This has been achieved without any marketing and advertising. There are now 11 web based form services available, including reporting of any crime and road traffic incidents. Use of the online crime reporting service has seen a steady increase since introduction in March 2017, with 5,892 of all crimes recorded by police in June 2017 (9% of the total) being reported online. This has risen from 7%, 6%, and 7% in March, April, and May respectively. It has now maintaining an average 7 to 8 percent. Use of online crime reporting has quadrupled since the launch of the new service in March, compared to the previous iteration.

Research has indicated (based on a sample size of 1500 adults living in Greater London) that up to 95% of Londoners with access to the internet would be open to using any part of the online service. Research indicates that amongst 65-75 year olds with access to the internet, 91% of this age group in Greater London are open to using any part of the online service. Some people have already started to use MPS online services.

The MPS receive 38,000 Road Traffic Incident (RTI) reports a year from the public. Prior to the launch of the online form, the only way a member of public could report such incidents was at a front counter on a paper

form which was then sent in the internal post to the relevant department to process. Since the launch of the RTI form in November 2016 there has been a steady increase in the use of the online form. Two thirds of RTI reports are now submitted online. This shows a significant shift from front counters to the online service. The benefits of the online form are that the report is received instantly and a reference number is issued resulting in a better customer experience and service.

The MPS aims to have a positive impact on both those who need to access policing and those working for us. Providing accessible policing services is central to maintaining a strong relationship between communities and the MPS. We will therefore develop all channels proportionately and cost effectively including our face to face work, to ensure we provide practical options for people facing barriers such as language, access to the phone and Internet.

A March-May 2017 snapshot survey indicates that 8% of all crimes reported to the MPS are reported at front counters. This percentage has been used to extrapolate results based on information from crime reporting system. In general we will be closing the police stations with the lowest crime reports, which will minimise the impact on communities.

A two-week footfall survey was undertaken at all front counters in May 2017. The top reasons for accessing the front counter (footfall survey 2017) were to make general enquiries relating to information such as appointment with staff e.g. statement (16.7%), to report a crime (10.3%) sign on bail (12.2%).

## AGE:

It has been put to us that the development of online services and other digital solutions may disadvantage older people who may prefer 'face to face' contact, if it was pursued as the main point of contact with the police.

Response Policing services will be delivered in every neighbourhood through the provision of one 24/7 front counter in each borough, an increase in dedicated ward officers to two per ward and locally based police contact sessions. There will be a minimum of one contact session per week in every ward to ensure that in face to face public access to the MPS continues for those who value it. In setting these contact sessions we will engage with local communities and ensure that various sections of society – including those from harder to reach groups – will have sessions aimed at them.

There is little variation by age in the proportion of people reporting crimes at front counters compared to other reporting routes. However, visitors aged over 18 are twice as likely to report a crime at a front counter compared to under 18's.

The evidence shows that just 7% of all crimes reported at front counters were by people over the age of 60, which is in line with the proportion of all crimes reported by people over 60 through any means, but lower than the proportion of older people in the London population which is 16%.

As with other people who need to access the police, older people will be able to make use of 999 or 101, with the commitment that people who need to see a police officer face to face, particularly if they are vulnerable, will be able to do so.

According to the 2017 ONS (Office of National Statistics) report virtually all adults aged 16 to 34 years were recent internet users (99%), in contrast with 41% of adults aged 75 years and over.

The proportion of victims currently using our online services to report crimes does not vary significantly by age.

## DEAF AND DISABLED / DISABILITY:

Research undertaken, combined with feedback received through the MPS/MOPAC consultation highlighted a general concern on the needs of disabled people accessing front counters has identified the need for all front counters to be accessible, to reduce queuing/waiting times, provide clear instructions to visitors and be staffed by an appropriately trained workforce. All proposed future 24/7 sites are Equality Act compliant and will offer access and hearing loop facilities.

Public areas will be maintained to a suitable standard, providing information to the community about what services are available from the front counter and promote any alternatives that may be more convenient. In addition promotional material advertising other policing services and access channels will be displayed at the front counter.

Consultation feedback indicated that visually impaired people find signage difficult to use. Best practice points to partially sighted people being assisted by good lighting and colour contrast along with tactile paving. In general, people with any specific needs will be best served by well-trained staff operating to clear processes. The MPS web pages do provide full information on all public access facilities provided at each police station.

Front counters will operate to a set of minimum standards which will aid in mitigating identified issues relating to accessibility. The key elements of the proposed face-to-face service commitment include an assurance that all front counters will be readily accessible by public transport and for those communities where people would have to travel in excess of 60 minutes to their nearest 24/7 front counter there will be a specific offer of enhanced contact in their area. This will take the form of sessions held twice weekly in accessible locations affected which will be piloted for 6 months. As with other contact sessions, they will be advertised on the ward Twitter and Facebook pages, the use of neighbourhood leaflets, as well as any local forums/media considered appropriate. Services offered will include, crime reporting, crime prevention advice, property marking and signposting to other MPS or partner agency services. These enhanced contact sessions would be held at sites that would offer the privacy required when reporting sensitive issues.

Dedicated Ward Officers (DWOs) will hold regular Contact sessions which will be documented on their websites and in local press/publications, which will make it easier for members of the public to have face to face contact with local DWOs. DWOs will interact with vulnerable members of their communities in their own homes and offer police contact. Specific ward based engagement plans will be developed to increase accessibility and communication in known high footfall areas for or deaf and disabled community.

#### **GENDER REASSIGNMENT:**

There is no evidence from the consultation feedback that suggests that the proposed changes will impact on Gender Reassignment group specifically. However, we are mindful that people within the trans community may be victims of hate crime. Victims of hate crime, or other sensitive crime types, may value the privacy offered by a front counter. The remaining front counters will retain a privacy room for use in the reporting of Hate crime and incidents of a sensitive nature.

The following will help to mitigate against the issues that have been identified to date:

Traditional methods of reporting will remain in place, such as 101 or 999 Furthermore someone from the transgender community may feel more comfortable reporting certain issues from the comfort and privacy of their own home, work or other locations than busy front counters which are generally not pleasant places to wait to report crimes.

There has also been an increase in Dedicated Ward Officers (DWOs) to two per ward allowing for greater face to face contact. DWOs will carry out community contact sessions which will give a more flexible approach to face-to-face contact. This means we will have an increased number of locations where people can engage with the police, and DWOs will have the flexibility to make these sessions specifically tailored to each area based on need.

## PREGNANCY AND MATERNITY:

There is a potential impact for this group with regard to mobility and travel to a front counter. With the proposed list of retained front counters, 97 percent of the public across London will be able to reach a front counter within 45 minutes.

Where a Front counter has been closed an 'emergency telephone' will be installed outside, that would allow a

member of the public to directly contact Met police command and control should they require assistance and if necessary an officer could be deployed to attend.

We are increasing the number of Dedicated Ward Officers (DWOs) to two per ward allowing for greater face to face contact. DWOs will carry out community contact sessions which will give a more flexible approach to face-to-face contact. This means we will have an increased number of locations where people can engage with the police, and DWOs will have the flexibility to make these sessions specifically tailored to each area based on the needs of local communities / local people.

Traditional methods of reporting will remain in place, such as 101 and 999, which will still allow for those who are unable to attend a front counter due to pregnancy/maternity to still request an officer to attend if required. Furthermore some pregnant women may feel more comfortable reporting certain issues from the comfort of their own home, work or other location than busy front counters which are generally not pleasant places to wait to report crimes.

## RACE:

From, Oct 2016 - Sep 2017 39.7% of all victims reported to MPS were BME. 47.0% of victims who reported crime via front counter were BME. 21.8% of BME victims of serious sexual offences reported at a front counter compared to 18.3% of white victims. As below, there are better services available for these victims at the front counters.

Once a front counter is closed those people in the community who perceive the front counter as a place to go to be safe may have increased concern. In order to mitigate this the following corporate action will be taken:

- 1. Installation of external all-weather telephones with direct access to 999/101 services on MPS premises that were formerly open as front counters.
- 2. External signage clarifying opening hours, inviting use of all-weather phone and noticeboard information about alternative methods of contacting police
- 3. Local communication strategy to provide information about closures, changes to opening hours and alternative channels of access.
- 4. Pan London and local publicity campaigns, such as proactive press releases, aimed at informing customers and diverting them to alternative methods of accessing policing services, such as via the 101 number, the internet or the remaining 24/7 front counter, that best suits their needs.
- 5. Articles and adverts in minority publications to ensure that BME groups are included in communications.
- 6. Public areas will be maintained to a suitable standard, providing information to the community about what services are available from the front counter and promote any alternatives that may be more convenient. In addition promotional material advertising other policing services and access channels will be displayed at the front counter.

With English as a second language there are consequences for front counter service provision in terms of the ability to communicate in languages that reflect London's diverse communities and in interpreting arrangements. The 101 call facility allows for this group to better communicate with MPS with the option of adding interpreters to the call

The MPS has a Language Programme delivered by Language and Cultural Services which includes: Telephone Interpreting (via Language Line)

The Interpreter Deployments Team (IDT) at Hendon which has 24/7 access to linguistic support services Specialist Deployments (MPS Own Staff) consisting of 1000 MPS employees with language, cultural and life skills

Remote Interpreting whereby every borough has been provided with video conferencing equipment.

#### **RELIGION OR BELIEF:**

There is no evidence from the consultation feedback that the proposed changes will impact on religion or belief specifically. However, we are mindful that people of differing religions and beliefs may be victims of hate crime. Victims of hate crime, or other sensitive crime types, may value the privacy offered by a front counter. The

remaining front counters will retain a privacy room for use in the reporting of Hate crime and incidents of a sensitive nature.

Once a front counter is closed, those people in the community who perceive the front counter as a place to go to be safe may feel more anxious.

Front counters remain a symbolic police presence in local neighbourhoods and any change to front counter service provision could be contentious as local communities consider the facility to be an integral part of their community. Once a front counter is closed or opening hours are reduced those people in the community who perceive the front counter as a place to go to be safe may feel more anxious.

The following will help to mitigate against the issues that have been identified to date:

Where a Front counter has been closed an 'emergency telephone' will be installed outside, that would allow a member of the public to directly contact Met police command and control should they require assistance and if necessary an officer could be deployed to attend.

We are increasing the number of Dedicated Ward Officers (DWOs) to two per ward allowing for greater face to face contact. DWOs will carry out community contact sessions which will give a more flexible approach to face-to-face contact. This means we will have an increased number of locations where people can engage with the police, and DWOs will have the flexibility to make these sessions specifically tailored to each area based on the needs of local communities / local people.

Traditional methods of reporting will remain in place, such as 101 and 999, which will still allow for those who are unable to attend a front counter due to age to still request an officer to attend if required. Furthermore some older people may feel more comfortable reporting certain issues from the comfort of their own home, work or other location than busy front counters which are generally not pleasant places to wait to report crimes.

## SEX:

The May 2017 footfall survey shows 45% of people attending a front counter were female, 50% male and 5% sex unknown / not recorded.

Female victims are disproportionally victims of domestic abuse and serious sexual offences compared with males. Between Jan 2015 - Dec 2016 Domestic Abuse (DA) represented 16.8% of all crimes reported to the MPS. Of this figure, 7.7% of all DAs were reported via a front counter.

Serious sexual offences represent 1.7% of all crimes reported to the MPS in 2016. 13% of all serious sexual offences are reported via a front counter. 87% of serious sexual offence victims were women.

From Aug 2016 to July 2017 a total of 146790 Domestic assaults were reported. Of those 12029 were reported via the front counter which confirms that 8.2 % domestic assault victims utilised the front counter as a reporting method

From Aug 2016 to July 2017 a total of 8069 rape crime reports were reported of those 1155 were via the front counter which confirms that 14.3% of rape victims utilised the front counter as a reporting method.

The majority of these crimes are, then, reported over the telephone.

We are committed to providing more appropriate facilities for these victims and so are also continuing to invest in specific services for those victims of crime who need a specialist place for them to be looked after. The Mayor has made a commitment in his new Police and Crime Plan to sustain funding for the three London Sexual Assault Referral Centres (also known as the Havens) and the four London Rape Crisis Centres. In the current financial year MOPAC contributed a total of £3.5 million in funding to the two services - £1,260,000 to the Rape Crisis Centres and £2,165,000 to the London Havens. £70,000 in funding was also provided to the four Rape Crisis Centres to support the development of an interpreter service.

In 2016/17 the four London Rape Crisis Centres supported a total of 2,866 survivors of rape and sexual

violence. This was through a variety of service provision including one to one counselling support, group work, telephone helpline support and long term advocacy provision. The London Havens provided Forensic Medical Examinations to approximately 1,500 survivors of sexual assault and supported 1,300 survivors accessing the service through their urgent self-referral number.

The front counter is an environment that has a role to play in supporting vulnerable women and communities. One 24/7 front counter will be available per borough. The provision of one 24/7 front counter per borough will provide those vulnerable woman and vulnerable groups within communities who want to attend a front counter access to those services in a safe and confidential space.

#### **SEXUAL ORIENTATION:**

There is no evidence from the consultation feedback that the proposed changes will impact on sexual orientation specifically. However, we are mindful that people within the lesbian, gay and bi-sexual (LGB) community may be victims of hate crime. Victims of hate crime, or other sensitive crime types, may value the privacy offered by a front counter. The remaining front counters will retain a privacy room for use in the reporting of Hate crime and incidents of a sensitive nature. Once a front counter is closed, those people in the community who perceive the front counter as a place to go to be safe may feel more anxious.

The following will help to mitigate against the issues that have been identified to date:

Where a Front counter has been closed an 'emergency telephone' will be installed outside, that would allow a member of the public to directly contact Met police command and control should they require assistance and if necessary an officer could be deployed to attend.

We are increasing the number of Dedicated Ward Officers (DWOs) to two per ward allowing for greater face to face contact. DWOs will carry out community contact sessions which will give a more flexible approach to face-to-face contact. This means we will have an increased number of locations where people can engage with the police, and DWOs will have the flexibility to make these sessions specifically tailored to each area based on the needs of local communities / local people.

Traditional methods of reporting will remain in place, such as 101 and 999, which will still allow for those who are unable to attend a front counter due to age to still request an officer to attend if required. Furthermore some older people may feel more comfortable reporting certain issues from the comfort of their own home, work or other location than busy front counters which are generally not pleasant places to wait to report crimes.

# **ANNEX**

Consultation Log			
Name of Business Group / Unit, Association, Stakeholder (External)	Why are you approaching / not approaching them?	Date and method of planned consultation	Outcome of consultation
Public Access Programme Board	Discussion around front counters	Meetings held monthly	Ongoing
MPS Property Services Directorate	Estate Strategy	Ongoing	
MOPAC Public Consultation		14 <sup>th</sup> July for 12 weeks	Detailed analysis prepared for each borough, including equality concerns, feedback fed into this document.
Organisational Change Consultation presented to TUs	Notification of Change	27 <sup>th</sup> June during Extraordinary TU Tier 1 meeting	TU informed of proposed changes
Initial Notification of change letters to trade unions	Notification of Change	28 <sup>th</sup> June	TU informed of proposed changes
Trade Unions - weekly meeting leading up to the staff posting process	weekly update	10 <sup>th</sup> July	Ongoing
Letters to public access officers	Notification of change	13 <sup>th</sup> July	Staff notified of changes
HEAR Pan-Equality Hate Crime Network Isle of Dogs	Key Stakeholder	02 <sup>nd</sup> Aug	Feedback feed into this document
Safer Neighbourhood Boards PA&E Workshops City Hall	Key Stakeholder	3rd Aug, 12th & 19 <sup>th</sup> September	Feedback feed into this document
Young people from the GLA Peer Outreach Team City Hall	Key Stakeholder	28th September	Feedback feed into this document

Representatives from older peoples organisations (members of the former Mayor's Older People's Advisory Group) City Hall	Key Stakeholder	29th September	Feedback feed into this document
Young people with special needs (a mixture of physical disabilities and learning disabilities) representing 5 Specialist Schools in Bromley Bromley Civic Centre	Key Stakeholder	2nd October	Feedback feed into this document
Inclusion London. Representatives from Deaf and Disabled People's Organisations (DDPOs) Lambeth	Key Stakeholder	2nd October	Feedback feed into this document
Safer Neighbourhood Boards Forum City Hall	Key Stakeholder	3rd October	Feedback feed into this document

EIA Action Plan Template Service Delivery Impacts (External)						
Potential positive / negative issues / impacts	Activity	Role Holder	Action By Date	Progress/Timescale/ Monitoring		
Age:  Older people are concerned that front counters might not in the future be accessible via public transport.	Average travel times across London show that 97% of the population have an average travel time to a front counter of up to 45 minutes. It should be noted that the key difference between the current front counter travel time and the future travel time is in the 30 minute time range. Currently around 86% of the population can reach a front counter in 30 mins; in the future 68% of the population can reach a front counter in 30 minutes. Those boroughs identified as having a more then 60+ journey are Barnet,	Programme Lead		Ongoing process and monitoring		

	Bromley, Croydon, Enfield, Harrow, Havering, Redbridge & Hillingdon  The evidence shows that our current front counters are not well used by older people. In fact, just 7% of all crimes reported at front counters were by people over the age of 60, lower than their proportion in the London population of 16%. This is in line with the proportion of all crimes reported by people over 60.  As with other people who need to access the police, older people will be able to make use of 999 or 101, with the commitment that people who need to see a police officer face to face, particularly if they are vulnerable, will be able to do so.  DWOs and community contact session will also have an important part to play in making sure that older people can speak to officers when they want to.		
Deaf and disabled/Disability:  Research undertaken to ascertain the needs of disabled people accessing front counters has identified the need for all front counters to be accessible, to reduce queuing/waiting times, provide clear instructions to visitors and be staffed by an appropriately trained workforce.	The remaining sites will have all the required access requirements such as hearing loops, lifts/ramps for those with deaf/disabilities needs.  With the transformation of front counter designs and offerings, accessibility will form part of the plans and designs for all of the front counters.	Programme Lead	Ongoing process and monitoring
Religion and Belief:	An effective communication strategy will be established to divert people towards using	Programme Lead	Ongoing process and monitoring

Online Survey - All respondents identifying a particular religion and belief indicated that their preferred method of making a complaint against the Police would be at a police station other than respondents of a Jewish faith who indicated that their preferred method for making a complaint would be by letter/fax with their second preferred method being at a police station. People of a Muslim and Hindu faith have indicated that their second preferred method for making a complaint would be via the non-emergency number.	both front counters and contact sessions as a method of making a complaint.  There will remain one 24/7 front counter per borough.		
Race  Once a front counter is closed those people in the community who perceive the front counter as a place to go to be safe may have increased concern.  Oct 2016 - Sep 2017 39.7% of all victims reported to MPS were BME. 47.0% of victims who reported crime via front counter were BME. 21.8% of BME victims of serious sexual offences reported at a front counter compared to 18.3% of white victims.	services, such as via the 101 number, the internet or the remaining 24/7 front counter, that best suits their needs	Programme Lead	Ongoing process and monitoring
Pregnancy and maternity  There is a potential impact for this group with regard to mobility and travel to a front counter. With the proposed list of retained front counters, 97 percent of the public across London will be able to reach a front counter within 45 minutes.	command and control should they require	Programme Lead	Ongoing process and monitoring

	DWOs and community contact session will also have an important part to play in making sure that older people can speak to officers when they want to			
Gender Reassignment  There is no evidence from the consultation feedback that suggests that the proposed changes will impact on Gender Reassignment group? Specifically. However, we are mindful that people within the trans community may be victims of hate crime.	_ · · · · · · · · · · · · · · · · · · ·	Programme Lead	Ongoing process monitoring	and
Sex The May 2017 footfall survey shows 45% of people attending a front counter were female, 50% male and 5% sex unknown / not recorded.  From Aug 2016 to July 2017 a total of 146790 Domestic assaults were reported. Of those 12029 were reported via the front counter which confirms that 8.2 % domestic assault victims utilised the front counter as a reporting method.  From Aug 2016 to July 2017 a total of 8069 rape crime reports were reported of those 1155 were via the front counter which confirms that 14.3% of rape victims utilised the front counter as a reporting method	vulnerable groups within communities access to policing services in a safe and confidential space. This will ensure that we will meet the needs of, for example, the victims of serious sexual offences in providing face to face engagement within a place of safety and privacy. The availability of adequate private rooms, such as interview rooms, where victims can report sensitive and confidential matters and the availability of trained, supervised, warranted	Programme Lead	Ongoing process monitoring	and

Sexual Orientation	The remaining & future redesign of front	Programme	Ongoing process	and
	counters will retain a privacy room for use in	Lead	monitoring	
There is no evidence from the consultation	the reporting of Hate crime and incidents of			
feedback that the proposed changes will	a sensitive nature.			
impact on sexual orientation specifically.				
However, we are mindful that people within	<b>3</b> ,			
the lesbian, gay and bi-sexual (LGB)	established to divert people towards using			
community may be victims of hate crime.				
Victims of hate crime, or other sensitive	a method of making a complaint.			
crime types, may value the privacy offered by	T			
a front counter.	There will remain one 24/7 front counter per			
	borough.			