MAYOR’S OFFICE FOR POLICE AND CRIME, POLICE & CRIME PLAN CONSULTATION WRITTEN RESPONSE

*Thank you to the members of the London DDPO Hate Crime Partnership for your expertise, knowledge, and input.*

*We are stronger together!*

This forms Inclusion London’s written response to the Mayor’s Office for Police and Crime (MOPAC) Police & Crime Draft Plan consultation on behalf of the London DDPO Hate Crime Partnership.

*The chapter and page number references refer to the Police & Crime Plan Draft Consultation document. We have added the text that the comments are responding to and highlighted our recommendations for ease of reference.*

ABREVIATIONS USED:

BCU – Basic Command Unit

BSLi – British Sign Language Interpreter

BTP – British Transport Police

CATCH – Community Alliance To Combat Hate

CJS – Criminal Justice System

CPS – Crown Prosecution Service

DDPO – Deaf & Disabled People’s Organisation

DIAG – Disability Independent Advisory Group (MPS)

HCOPS – Hate Crime Outcome & Performance Officers (MPS)

IAG – Independent Advisory Group (MPS)

IOPC – Independent Office for Police Conduct

MPS – Metropolitan Police Service

MARAC – Multi Agency Risk Assessment Conference

PAS – Public Attitude Survey

PRUs – Pupil Referral Units

SEN – Special Educational Needs

TfL – Transport for London

YDP – Young Disabled People

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General comments

We are disappointed that despite being consulted on to improve engagement with Disabled Londoners, the consultation plan was not provided in alternative formats. This is a good example of everyday Disablism, when it is left to the last minute to organise or think about. It should be the first thing that is part of any consultation, policy, or service.

We recommend that MOPAC work with the GLA Disability Stakeholder Group to embed Equality Act requirements into all areas of work.

Disabled Londoners have intersectional identities that cut across all areas of MOPAC’s work. It is vital that this is understood and that all areas of work have disability issues included.

We recommend that MOPAC work with Inclusion London on how to develop more intersectional ways of working and contact our ‘With Us’ Project.

One of our members said, ‘It is one thing to have to trim priorities due to reduced time to deliver, which is something we have been told after asking why there is no detail in the plan, especially for hate crime, and quite another to produce a final document that has no way for anyone to be held to account due to the vague wants and soundbites included.’

Chapter 4. Our Priorities

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*Reducing and preventing violence*

*Increasing trust and confidence*

*Better supporting victims*

*Protecting people from exploitation and harm*

We agree with the overall priorities. However, we feel that there should also be a priority for:

*Better, accessible communication and engagement*

It needs to be made explicit that MOPAC are working to the Equality Act and that all communication and engagement is fully accessible to Disabled Londoners.

*Increased accountability and transparency*

We feel that MOPAC can build on the work of the various stakeholder groups to include workstreams and actions that can be used to hold agencies accountable.

Having this made explicit would improve confidence that MOPAC are not only listening to stakeholders but acting on their input.

*Improving outcomes for marginalised groups*

We feel that the priorities are too vague and marginalised groups need to be explicitly mentioned in the top priorities. There are specific areas of work that need to be done to make services and support more inclusive for the range of protected characteristics that the services are currently set up for.

There is an opportunity to set up intersectional services to acknowledge an individual’s range of intersecting identities and how that can impact on outcomes.

Chapter 4.1 Measuring Success

Page: 11

*MOPAC will use a mixture of quantitative and qualitative measures, avoiding numerical targets and any measures liable to change in the way they are recorded.*

For hate crime, we recommend working with local community groups and organisations like CATCH Partnership and London DDPO HC Partnership who already collect data and insights into hate crime. Work with MPS Hate Crime Hub and the newly formed MPS Hate Crime Strategic / Stakeholder groups, in conjunction with the other CJS and PAS sources mentioned in the draft.

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*We will also make use of qualitative information as well as such HMICFRS inspection reports and academic studies to help us to understand performance and identity issues that need to be addressed.*

We recommend the Greenwich Disabled Witness Project, Dr Mark Walters, Dr Jane Healy, Katherine Quarmby and Dr Neil Chakraborti for hate crime research. We keep an online library of research relating to hate crime so can be called on for other recommendations.

*We will expand the MOPAC Public Attitude Survey of Londoners to include additional questions on Londoner’s experiences of crime in their local area.*

We would welcome additional questions to the PAS. However, some of us have lived in London for decades and never been approached to participate.

Using ‘as recorded by police’ data will miss a huge number of crimes that go unreported. To acknowledge the severe underreporting of hate crime,

We recommend that you make use of the Crime Survey for England and Wales to extrapolate data for Londoners.

We recommend that survey data to be available publicly for analysis to find out demographics of responders, for example.

We would welcome more detail on how the survey is made accessible for Disabled Londoners. Phone calls do not cover all access requirements, for example, Deaf Londoners; there needs to be BSLi video link option. I would suggest working with us to work out best ways for all the different impairment groups.

We have concern that people who are particularly upset or let down by their experiences will not engage with a survey of this kind so,

We recommend working with CATCH, London DDPO HC Partnership and other community groups to get experiences from people who do not want to engage with PAS due to poor / negative experiences.

Can the PAS be updated to be online and in person as well as via phone calls?

We recommend that all versions of surveys and questionnaires need to have Disability accessibility assessments.

Chapter 4.2 Supporting London’s Recovery

Page 15

*The pandemic has also exposed long standing inequalities in our society; with the virus and its economic and social harms disproportionally affecting Black, Asian and Minority Ethnic Communities.*

The pandemic has also exposed long standing inequalities in our society disproportionally affecting Disabled Londoners too.

We recommend that you read our report, “Abandoned, Forgotten, Ignored” - <https://www.inclusionlondon.org.uk/disability-in-london/coronavirus-updates-and-information/campaigns-news-during-coronavirus-crisis/abandoned-forgotten-and-ignored-the-impact-of-covid-19-on-disabled-people/>

There is real opportunity here to employ more Disabled Londoners due to remote working practices. Many highly qualified Disabled people need remote working as an access requirement, and this has prevented them from employment previously.

*The London Recovery Board is working on nine missions, all of which contribute to the Mayors vision for a more confident, healthier, prosperous and fairer London.*

* *A Greener New Deal*
* *A Robust Safety Net*
* *High Streets for All*
* *A New Deal for Young People*
* *Good Work for All*
* *Mental Health & Wellbeing*
* *Digital Access for All*
* *Healthy Food, Healthy weight*
* *Building Strong Communities*

All 9 missions for the London Recovery Board relate to issues affecting Disabled Londoners. The Board need representation from the Disabled community to shape how these missions will be implemented.

Anchor Institutions Charter – Make sure GLA, MPS and TfL include employment opportunities for young disabled people.

We can only build strong communities with the resources to be able to do so. Organisations run by people with lived experience are best placed to provide holistic community strength and resilience. There is a network of over 70 DDPOs that can help but need financial and training support.

We recommend a ‘Disability’ Lead or representative for each mission.

Chapter 5. Reducing and Preventing Violence

* *Preventing and reducing violence affecting young people*
* *Making London a city in which women and girls are safer and feel safer:*
* *Reoffending and the most violent and high-risk groups is reduced;*
* *Preventing hate crime.*

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*Data to monitor and oversee the delivery of this ambition:*

*The number of homicides (domestic and non-domestic) as recorded by the police.*

*Non-domestic knife crime with injury affecting under-25-year-olds, as recorded in NHS admissions data.*

*Lethal barrel gun discharges, as recorded by police.*

*The reoffending rate for the most violent cohort, as recorded as part of Integrated Offender Management.*

*The reoffending rate of perpetrators of domestic abuse and sexual violence, as recorded by police.*

*Women’s feelings of safety in their area during the day and at night, as recorded by the MOPAC Public Attitude Survey.*

*Londoners experience of hate crime, in person and online, as recorded by the Public Attitude Survey.*

As stated before, the PAS is not accessible to Disabled Londoners. There are other opportunities to work with the MPS HC Strategic / Stakeholder Groups, CATCH and London DDPO HC Partnership to gather better quality data. PAS needs an accessibility assessment and improvements to capture Disabled Londoners experiences.

Due to lack of trust in process and agencies, there needs to be other ways of gathering data from those who do not want to engage with a survey due to negative experiences.

The focus on preventing hate crime is contentious as we are unclear what services and support are currently in place to help with *preventing* hate crime against Disabled people.

We recommend changing ‘preventing hate crime’ to, “improving reporting for hate crime” so this can include increasing official reporting to acknowledge severe underreporting; developing and setting up preventative services in the community (awareness raising is particularly needed for hate crime against Disabled people within the community); more hate crime advocates to deal with cases regardless of whether victim goes through CJS.

Chapter 5.1 Preventing Violence with a Public Health Approach

*London should adopt a public health approach towards violence meaning that we prioritise intervention and prevention; place communities and young people at the heart of change and develop immediate and long-term solutions.*

*Violence Reduction Unit (VRU) set up in 2019 within MOPAC to tackle underlaying causes of violence.*

We welcome this approach and suggest that there is work to be done around understanding Disablism / Ableism and how this manifests in individuals, services and society that leads to violence against Disabled people.

We recommend that MOPAC develop a programme of learning on the Social Model of Disability and Cultural Model of Deafness as well as Intersectional Training to understand how Disabled Londoners are disproportionately affected by violence.

We recommend specific focus to address issues due to Disabled Londoners are more likely that their non-Disabled peers to be unemployed, under-employed, under-qualified, living in unsuitable accommodation, targeted because of who they are and victims of violence.

Chapter 5.2 Preventing and Reducing Violence Affecting Young People

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*Problem Oriented Policing*

*Rescue and Response programme*

Young Disabled People (YDP) are targeted by gangs to carry out crime, commonly YDP with learning difficulties and/or neuro-diversity.

YDP in SEN Schools or PRUs are at more risk of grooming / exploitation / gang coercion.

There is a disproportionate number of Disabled people in the criminal justice system.

We would suggest looking into research into the involvement of disabled children and county lines.

How what you address discriminatory profiling? Disabled people are often stopped if they seem to be ‘acting strangely’, due to an impairment; for example, seeming to stagger and sway due to motor-neuron condition but assumed to be drunk.

We recommend specialist training to understand how these YDP get exploited by gangs / county lines and a multi-agency approach to prevent and reduce YDP becoming criminalised through exploitation.

*Specialist support to young victims of violence requiring hospital treatment; young victims of crime linked to gangs; and those wanting to exit gangs, whilst also ensuring a gender responsive approach.*

We recommend that MOPAC set up systems to identify YDP and ensure they are supported.

Chapter 5.3 Reducing Offending Behaviour

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*Working with people already involved in crime to prevent them from committing further offences.*

We would welcome Young Disabled people, including those with mental distress and trauma are specifically acknowledged in the plan.

We would welcome more insight into how Disabled people in the CJS with set up services to meet their needs?

Young Disabled people are targeted by gangs to carry out crime. Commonly YDP with learning difficulties / neuro-diverse. There needs to be training to understand how these YDP get exploited by gangs / county lines and a multi-agency approach to prevent and reduce YDP becoming criminals through exploitation.

There is a disproportionate number of Disabled people in the criminal justice system.

How will the Young Adults Hub engage with DYP? Will they commission DDPOs to provide services?

Again, all the initiatives outlined need to be fully accessible for Disabled people.

Chapter 5.4 Making London a City in which Women and Girls are Safer and Feel Safer

Page:19

*Every woman and girl should be able to live their lives in safety and confidence.*

Disabled women are more likely to be victims of Domestic Abuse and violent crime than non-disabled peers.

There are numerous cases of gross misconduct involving policer officers exploiting women in mental trauma and distress.

We recommend MOPAC show in the plan how the MPS will be held to account for Police Officers exploiting Disabled women.

We recommend that the plan show how MOPAC will support and how services will be fully accessible with understanding of the specific needs for Disabled woman and girls.

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*Working with statutory partners and the VAWG sector, MOPAC provided emergency accommodation for domestic abuse victims and their families, those with no resource to public funds, LGBTQ+ and male victims … wrap-around support services … MPS stepped up enforcement … arrested more suspects …*

There is currently a lack of accessible housing for Disabled women needing refuge and a lack of accessible services to offer support. We would welcome more information about how the sector will address this.

We recommend a full analysis of Disabled women and girls experiencing violence with accompanying workstreams.

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*Lobbying to extend hate crime laws to include those based on someones gender including misogyny; and to change the law to make sexual harassment a specific criminal offence in public spaces.*

Can we have this detail included in the hate crime section of this document to include lobbying for the range of recommendations in the Law Commission’s Hate Crime Reform Report please?

Chapter 5.5 Tackling Hate Crime

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*The Mayor takes a zero-tolerance approach to all forms of hate crime across all protected characteristics.*

While there are vacuities throughout the document, they are particularly present here. This is not a plan; it is a statement so vague as to almost be meaningless.

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* *The Mayor will continue to use his position to champion Londons diversity one of citys greatest strengths promote integration and stand in solidarity with all of Londons diverse communities against hatred and abuse.*

This is not a plan; it is a vague statement.

Messaging on hate crime isn’t well received by the public on social media.

We need clear messaging that hate crime isn’t an additional crime, it’s an additional punishment for defendant if found guilty. That hate crime is any crime committed that targets a person because of who they are. There is a public perception that focusing on hate crime takes the police from ‘real’ or ‘violent’ crime. Can this narrative be challenged? There has been an increase in violent crime against Disabled people that is motivated by hostility and prejudice. Hate crime is more than just name calling. We need messaging that reflects that.

The impact of hate crime is felt by all Londoners.

We would welcome an acknowledgement of the victimisation and abuse of people on benefits. Narratives in the media needs to promote messaging that takes the blame away from the individual and promotes inclusiveness for all socio-economic groups. We want to live in a society that looks after people when they need it, not demonise and blame.

We would welcome value-based messaging on celebrating people’s intersectional identities and punishing those who target people due to those intersectionalities.

We recommend the London Mayor coordinate with the MPS and CPS on strategic comms.

* *MOPAC will ensure that victims of hate crime receive the specialist support that best meets their needs and will work with partners to build community confidence and resilience to stand together against hate. We will also work with CJS agencies to develop the evidence base for what works in addressing the behaviours of hate crime offenders, its causes and the impact on victims and communities.*

For Disabled victims of any type of hate crime, they need local services run by people with lived experience. There is already 3 DDPOs as part of CATCH. Can we develop more across London to raise awareness of hate crime with disabled Londoners to increase reporting more in line with actual incidents?

Can we have clearer targets set out under this? As it stands, it is a great statement but without clear outcomes and outputs there are no real targets to hold to account.

What will MOPAC do to acknowledge the high numbers of victims who do not want to report to the authorities but still need support to deal with consequences of incidents?

We recommend working with the newly set up HC Stakeholder / Stakeholder Groups set up clear workstreams, actions and accountability.

* *The MPS will continue to work with the communities most affected by hate crime both on and offline, including through its Independent Advisory Groups, as it seeks to increase the percentage of hate crime solved and improve the satisfaction of victims. Over this term, the MPS will work to identify and eliminate barriers to reporting, improve training and awareness of hate crime issues and improve justice outcomes.*

Our report, Poor Police Response: Disabled victims of hate crime highlights key issues and recommendations that MOPAC and other agencies can implement to improve on all these areas.

Extract from Poor Police Response: Disabled Victims of Hate Crime below:

***Key Recommendations***

*For Police*

* ***Reinstate Metropolitan Police Disability Hate Crime Matters Initiative***

*Following the launch of Disability Hate Crime MATTERS in 2016, the Metropolitan Police Service saw an increase in the number of recorded Disability Hate Crimes from 357 in 2015/16127 to 666 in 2016/17. In 2017/18, however, they recorded only 462 Disability Hate Crimes because the initiative stalled.*

*DHC Matters was delivered in the form of a briefing by Disabled people, and this was shown to be of greater benefit than online training.*

*DHC Matters has also been cited in the Greenwich Disabled Witness Project as a best practice model for all UK Police Forces to increase reporting and flagging of hate crime against Disabled people.*

* ***Make more use of the Metropolitan Police Disability Independent Advisory Group.***

*The DIAG is set up at the request of the Metropolitan Police as a critical friend and source of expert information and advice on improving services and understanding of disability issues. Officers can request information and advice on any Disability related issue, for example, Disabled protestors.*

* ***All Borough Command Units (BCUs) to set up or make use of CPS Multi-agency Scrutiny Panels for hate crime case reviews via Hate Crime Coordinators (HCOPS).***

*Held bi-annually, these need to include representatives from Safer Neighbourhood Teams, School Liaison Officers, Anti-Social Behaviour and Housing teams and CPS as well as local DDPO representatives or Inclusion London on behalf of the London DDPO HC Partnership to look at patterns, hotspots, poor responses to cases and work on responses to current cases being dealt with by DDPOs / CATCH Partnership.*

* ***Support / set up a Community Multi-Agency Risk Assessment Conference (Community MARAC) in each BCU to deal with high risk and repeat ASB and hate crimes cases and other cases involving adults at risk.***

*Disability hate crime is often referred to safeguarding adults or safer neighbourhood team. Work with other statutory agencies including Housing, to conduct regular reviews of Safeguarding Adults referrals to identify potential hate crime. There are multiple cases resulting in the death or murder of a Disabled person because the signs for escalation were missed.54*

*There is a need to conduct MARACs for all adults at risk so this would be an opportunity to work with other organisations to spot potential hate crimes that have been referred to safeguarding.*

* ***To make better use of local DDPOs via CATCH Partnership when responding to Disabled victims.***

*All Disabled victims can be referred to the CATCH Partnership, where one of our Partners, Stay Safe East provides triage for Disability hate crime. Stay Safe East will be able to put victims in contact with their local DDPO or provide casework if a DDPO is not available. Part of the service is to explain to victims what their rights are and work to resolve incidents before they become crimes. Making more use of Stay Safe East can prevent escalations as well as provide casework for hate crime cases.*

* *To counter Disablism*

*Specialist Equality Training led by people with lived experience and recruitment of Disabled Police Officers.*

*For recruitment processes to include personality assessments to ensure recruits have the right attitude and values to serve the public and marginalised groups.*

* ***Identify links between Anti-Social Behaviour / Neighbourhood disputes and hate incidents earlier.***

*HCOPS to make use of Metropolitan Police new technology & software to identify hotspots, repeat incidents and link to safeguarding adult referrals and anti-social behaviour reports.*

*For CPS*

* ***Prosecution of police officers dismissed for gross misconduct when involving Disabled people.***

*Make a public statement and put procedures in place to actively seek prosecution of police officers who have been involved in inappropriate behaviour, exploitation and abuse against Disabled people.*

* ***The CPS and MPS need to do more work together to understand the negative impact on the community if police officers who have assaulted, exploited or abused a Disabled person do not face criminal proceedings and to look at how those decisions are made and communicated to the Disabled community.***

*For Mayor’s Office for Police & Crime*

* ***MOPAC commissioners to ringfence part of small grants scheme and fund more localised organisations led by Disabled people to support Disabled victims and raise awareness of DHC within Disabled community in collaboration with the London-wide Hate Crime Partnership (CATCH).***

*The pilot of the CATCH Partnership was shown to work for minority groups in each hate crime strand apart from Disabled victims, who need more localised organisations to support them with the capacity to engage with the community to raise awareness of hate crime as many Disabled people are not aware that what they are experiencing is a crime. CATCH now has three DDPOs involved who cover London who provide hate crime advocacy casework. However, due to increasing caseloads this is not enough. There also needs to be proactive work to raise awareness of hate crime against Disabled people within the Disabled community, particularly people with Learning Difficulties. By funding more DDPOs across London boroughs to engage more with their local community about hate crime, they can refer into CATCH for casework, it would increase the numbers of Disabled victims being offered support regardless of a criminal case.*

*Hate crime interventions can be provided from a non-criminal justice perspective and treated as a public health issue, which DDPOs are well placed to provide, when provided with the resources to do so. Community groups working to promote social justice and rights, education and training-based approaches, bystander intervention and involvement, and prevention programmes are all alternatives that can reduce hate crimes.*

*We need to move away from approaching hate crimes in terms of people belonging to identity groups in silos or individual strands. Personal identities are intersectional and can be better served by holistic services. There need to be options for person-centred, user-led, collective approaches to post-hate crime support.*

* ***Work with MPS Deputy Commissioner’s Delivery Group***

*The DCDG was set up in 2020 in response to the last MOPAC Police & Crime Action Plan to look at improving trust in police among Black communities. We recommend that the Police Encounter Scrutiny Panels (PESPs) are expanded to Disabled people as part of the Police & Crime Plan 2021-2025, who can also have other protected characteristics and currently have the lowest level of satisfaction in how their cases are dealt with by the MPS.*

*For the London Assembly Police & Crime sub-committee*

* ***Prioritise hate crime against Disabled people to monitor progress and effectiveness of initiatives by MPS to improve reporting of Disability Hate Crime and Disabled victims level of satisfaction with how their cases are dealt with.***

*This initiative can be in collaboration with the PESPS, HCOPS, Scrutiny and MARACs.*

*In addition, one of our DDPO Partners Merton Centre for Independent Living, produced a report on Disability hate crime in their borough in October 202060. These localised recommendations can be adapted for all London boroughs.*

*It needs to be acknowledged that Disabled victims can also have other protected characteristics and there needs to be an intersectional approach to supporting Disabled victims of crime.*

*Disabled victims often do not recognise that what they are experiencing is a crime so this needs to be addressed through more community projects being able to provide awareness raising and support to report and recover.*

* *TfL, BTP and the MPS will continue to take a zero-tolerance approach to all forms of hate crime and abuse on the transport network to ensure customers and staff are safe, feel safe, and have the confidence to report any incident knowing that it will be taken seriously and investigated.*

There needs to be an acknowledgement of the numerous specialist services in the community, including DDPOs. One of our members said,

“One of the biggest problems we have had in London is the loss of services within each borough, who did support people with learning difficulties. So many organisations have gone - Lambeth lost People First and MENCAP.”

There needs to be an acknowledgement of unconscious bias and how to address that in all services. There are societal attitudes and prejudices that everyone is influenced by. These can manifest in how someone is treated to how a service is developed. We are saying that public services are not immune to these influences and need robust ways of dealing with them so Disabled people can be treated with dignity, kindness and respect.

What specialist training is provided on hate crime against Disabled people? Does it include intersectionality, social and cultural models of disability and how to become allies with disabled people? We have been developing training to address this and would welcome working with TfL, BTP and the MPS. The MPS can also reinstate DHC Matters. Training delivered by people with lived experience is known to be more effective. There needs to be a recognition that streamlining training to save time has not resulted in positive results. It is a false economy that ends up costing more, not just in money but poorer outcomes for victims.

We would welcome more detail in how good practice and training will be monitored and evaluated.

For victims that are using HC Advocates and are not getting good engagement from CJS, what can MOPAC put in place to progress cases that are being reported to police? How can a victim get a report taken seriously when the attending police officer refuses to acknowledge that what is happening is a crime?

MOPAC can make use of the Disabled Witness Project research to look at how to counter views that Disabled witnesses are ‘unreliable’. <https://gala.gre.ac.uk/id/eprint/27140/>. When the researchers came to present at our Big Learning Event in December 2019, police officers attending were particularly interested in this.

We feel that individual police officers with their own interests drive forward initiatives rather than a more coordinated approach based on what is happening in each borough. We would like to see more collaboration with the community to develop training and awareness raising initiatives.

Disabled victims need to know that they will be believed and that if they feel they have been targeted because of their impairment, then the officer will flag it as a hate crime, not dismiss how the person feels and make the decision whether to flag or not.

We feel that this is another example of Disablist practices that diminishes a Disabled person’s experience as they are though of as ‘less than.’

There needs to be an acknowledgement and plan for supporting the community, which needs resources.

The Government has just vetoed the Restorative Justice amendment, so will MOPAC set their own amendment? How will their evidence base be robust considering the extraordinary under-reporting, under charging, under-consequence nature of hate crime?

As a partnership, we felt that the barriers are well-known, and the focus needs to be ‘addressing the identified barriers’. We do not want to go through another cycle of ‘working to identify’.

We would suggest working with the HC Strategy Group and HC Stakeholder Group to create a bank of evidence to base, ‘addressing the identified barriers’.

We recommend that hate crime be included in the diagram under, ‘reducing repeats’. Hate crime often involves repeat victims and perpetrators.

There needs to be a clear structure of engagement from MPS with DIAG and Hate Crime HCOPS with clear agreed goals to monitor progress and outcomes. As a partnership we feel that meetings alone do not effect change so we need to change the meetings to include more structure to specific areas of work. Two members of DIAG are also part of this partnership. The experience of engagement from MPS on matters relating to Disabled people has been reactive not proactive. The DIAG is there for advice as well as responding to incidents.

We would welcome clearer guidance on how to hold agencies to account in relation to what is expected and part of a police officer’s job description. We often know what should happen, but this is not what actually happens and we need clarity on what avenues are available to be able to get cases actioned appropriately.

Specifically relating to TfL and BTP, can there be a better arrangement for use of CCTV when obtaining evidence for prosecution? We understand that currently BTP must apply for permission from TfL to get CCTV evidence. The CCTV footage is not stored for very long so if a victim does not make a report immediately, this can mean CCTV footage is no longer available.

We would also like to know if TfL is going to install CCTV that captures sound as well as visual.

We would welcome communications on cases that have been successful to improve reporting from Disabled victims.

To follow is an example of how the reporting process doesn’t work for disabled people, experienced recently by one of my colleagues at Inclusion London. They received an anonymous letter with hateful comments about their disability and living alone. They called me to ask if it was a crime. I encouraged them to make an online report. Online, it says that if you don’t hear anything in a set time to contact the police for a follow up. My colleague needs to be able to email as the phone is not accessible for them. There was no email to contact. I intervened and eventually police officers attended, took a statement then closed the case, as there had been no further incidents. My colleague felt that they would not have been able to make the report if I had not been supporting them, referring to senior officers to follow up, which they did. My colleague realised that it wasn’t ok what had happened. And it was a crime. Using this an example, it would be impossible to estimate the number of people who are unable to follow up an online report, which would close due to no further action.

Chapter 5.6 Working Together to Prevent Terrorism

80% of Prevent = Young Disabled People, so we would welcome a sensitive approach to consider why this is. There is a danger of stigmatising YDP, so it needs to be approached VERY delicately.

<https://www.theguardian.com/uk-news/2021/jul/07/staggeringly-high-number-of-people-with-autism-on-uk-prevent-scheme>

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*Use of Shared Endeavour Fund to counter radicalisation.*

How will MOPAC ensure Disabled people who are at risk of being radicalised are supported, especially online. Neuro-diverse people and people with learning difficulties need access to trusted sources in person to be able to understand the information they are reading online and how they can be put in vulnerable situations that can lead to radicalisation.

Examples in the media:

<https://www.theguardian.com/uk-news/2021/aug/13/plymouth-shooting-suspect-what-we-know-jake-davison>

<https://theconversation.com/no-evidence-links-autism-with-terrorism-but-ill-judged-statements-and-headlines-will-lead-to-stigma-164133>

<https://www.bbc.co.uk/news/uk-england-derbyshire-58504074>

We recommend working with us and our Breaking out the Bubble HC Project.

Chapter 6. Increasing Trust and Confidence

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* *Increase public trust in the MPS, and reduce gaps in confidence between different groups;*
* *Ensure that the MPS engages with Londoners and treats them fairly;*
* *Ensure that the MPS, borough councils and all community safety partners respond to the crime and anti-social behaviour which most concerns Londoners.*

We agree with these broad aims but would also like it acknowledged that Disabled Londoners are not a minority group at approximately 1.2 million in London. This group has severe lack of trust and confidence in the MPS, as highlighted in our Poor Police Response Report.

We recommend working with communities to develop ways to build trust and confidence that can be monitored and evaluated. We need to see results to be able to trust.

Chapter 6.1 Increasing Public Trust in the MPS

Page 25

*During this Police and Crime Plan period, the Mayor wants to:*

*Increase the percentage of Londoners who believe that the MPS is an organisation they can trust;*

*Increase the percentage of Londoners who believe that the police treat everyone fairly; and*

*Reduce the disproportionalities in levels of trust between different groups of Londoners to within 5%.*

The wording states that this is a want not a commitment. How can this be effectively implemented?

*Evidence shows that 56% of Black Londoners, 76% of other ethnic minorities, and 82% of white Londoners trust the MPS.*

According to the MOPAC survey, these statistics seem incorrect. The current % are:

Disabled – 56%

Black – 63%

<https://www.london.gov.uk/what-we-do/mayors-office-policing-and-crime-mopac/data-and-statistics/public-voice-dashboard>

It would be more helpful to list out all the percentages, including men and women and age groups.

Can MOPAC also use data from the Crime Survey for England and Wales, which may give a better insight than the PAS?

<https://www.crimesurvey.co.uk/en/index.html>

It would be helpful to have intersectional demographic data on victims to inform development of services and support.

Page 25

*MOPAC will use data from its Public Attitudes Survey to monitor and oversee performance against these objectives.*

Please refer to previous comments for page 12 of Plan.

Page: 26

*All police officers must adhere to the highest possible standards, and while the vast majority display exemplary professionalism and dedication, we must stamp out discrimination in all its forms, root out those who abuse their trusted position as officers, and ensure that tackling violence against women and girls is treated with the highest priority…*

A great statement that we would all agree with. We need more detail.

Our Hate Crime Data and Insight Project is scrutinising IOPC data so will be able to look at how many incidents involve disabled Londoners.

*MPS has published its Strategy for Diversity Inclusion and Engagement*

Louise Holden provided a response as Independent Advisor to the MPS. These are some of her comments on the draft STRIDE document here:

“‘Needs acknowledge / wording to reflect that Disabled people and other ‘vulnerable’ groups are not inherently so, it is the situation that makes them vulnerable. Focus needs to be on the perp not the victim. Be more victim focused.’

‘Where is reference to working to the Social Model of Disability?’

‘No mention of Disabled workforce? Need to challenge narrative that DP cannot work with examples of workforce who are disabled.

No mention of LGBTQ+?

Disabled people make up 14.2% of London population.’

<https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/mapping-disability-the-facts.pdf>

‘Disabled people are the largest group affected by COVID.

<https://www.inclusionlondon.org.uk/disability-in-london/coronavirus-updates-and-information/campaigns-news-during-coronavirus-crisis/abandoned-forgotten-and-ignored-the-impact-of-covid-19-on-disabled-people/>

Where is the Gold Group Support for them?’

‘Who is representing Disabled people at the Community IAGs?’

‘Need acknowledgement of intersectional issues and how they impact black communities.’

‘Include SEN schools to raise awareness of HC?’

‘We need Disability liaison officers.’

Having had a quick read of the published STRIDE Document, there are still references to vulnerable people, not people who are in vulnerable situations; There is no mention that I can see of recruitment of Disabled people and I have had no follow up of the offers to attend various meetings to look at how to incorporate issues relating to Disabled Londoners, apart from attending an internal MPS group on improving Disabled police officers experience of working for the MPS, which was incredibly interesting and inspiring!”

Chapter 6.2 Creating Safer, More Confident Communities

*Page: 30*

*Improving public confidence. The MPS will continue to develop its capability and capacity to solve more crimes and bring offenders to justice, investing in building the skills of investigators and improving the quality of files given to the Crown Prosecution Service for charging decisions.*

[*The Women’s Night Safety Charter*](https://www.london.gov.uk/what-we-do/arts-and-culture/24-hour-london/womens-night-safety-charter) *and* [*Police Crime Prevention Initiatives*](https://www.policecpi.com/)

As a community, we need regular updates and information on these projects so we can support understanding on issues affecting disabled Londoners and disseminate information to our communities.

Please refer to our recommendations in the Poor Police Response Report.

Chapter 7. Better Supporting Victims

Page: 32

*Improving the service and support that victims receive from the MPS and the criminal justice service, including online interaction.*

*Victims receiving a better criminal justice response and outcome.*

*Reducing the number of repeat victims of domestic abuse and sexual violence.*

We recommend adding hate crime to ‘reducing the number of repeat victims of …’

Our other comments relating to this are included in previous sections.

Page 32

*MOPAC will also ensure that any disproportionality in victim satisfaction and access to support between different groups of people, such as by age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation, as well as intersectional factors, is identified and measures taken to address them.*

We welcome this and recommend you put more detail as to how this will be done.

Page: 33

*MOPAC will use the following data to monitor and oversee the delivery of this ambition:*

*Victim satisfaction disproportionally for face to face and telephone and Digital Investigation Unit (TDIU), measured by the MOPAC User Satisfaction Survey and wider criminal justice data from partner agencies.*

*Prosecution statistics for rape and serious sexual offences and domestic abuse, as recorded and published quarterly by the Crown Prosecution Service.*

*Repeat victimisation statistics for domestic abuse and sexual violence, as recorded by the police.*

We would welcome this level of detail in the hate crime section or have hate crime referred to here too.

Page: 35

*In order to improve prosecution and conviction rates, MOPAC and the Victims Commissioner for London will continue to work with the MPS and BTP to identify reasons why victims withdraw from the criminal justice process; and improve support to encourage more victims to come forward and help them through the process.*

Although MOPAC have a reduced time to work to this plan, more detail is needed for hate crime to be able to monitor progress.

7.3 Reducing the Number of Repeat Victims of Domestic Violence

Page: 36

MOPAC will work with partners to ensure that victims of domestic abuse including migrant victims and those from Black, Asian and other minority ethnic groups – can access help without fear, with safe and informal spaces for victims who need to seek support.

No mention of the particular issues relating to Disabled victims of domestic abuse.

*… further investment to increase the number of Independent Sexual Violence Advisors who are trained to offer interim therapeutic support to sexual abuse victims.*

Will this include how to engage with Disabled women and girls? There will be specific issues around communication and mental trauma and distress.

8. Protecting people from being Exploited or Harmed

Page: 37

*Young People in the justice system are supported and safe.*

*Fewer young people and adults are exploited or harmed.*

*Londoners are protected in public, in private and online.*

Louise – there needs to be specialist services for YDP, especially for YDP with learning difficulties.

We have heard of cases from our DDPOs that involve young Disabled people being targeted online for sexual and / or financial exploitation. One case involved the YDP giving out their address and the perpetrators went to their home to continue intimidating and harassing for money. Other cases involve YDP being groomed into ‘relationships’ that then lead to exploitation. This can be extremely challenging for the YDP to deal with on their own and to understand what is happening.

8.1 Reducing the Number of Young People and Adults being Exploited or Harmed

Page 39

*TfL, working with the MPS, BTP and other partners, will enhance its safeguarding response to keep children and vulnerable adults safe from harm as they travel or seek refuge on the transport network.*

High levels of abuse and harassment that can lead to hate crime happen on public transport. We have specialist training being developed for staff working on public transport to understand the issues affecting Disabled people and how to become allies with disabled people to improve safety and support.

We would welcome working with TfL and BTP to develop our training materials further and deliver them to frontline staff.

9.3 Commissioning and Partnerships

Page 44

*MOPAC commissions a variety of services to prevent crime, reduce reoffending and support victims in support of the Mayors Police and Crime Plan ambitions. MOPAC is developing commissioning principles to guide its work during the period of this plan:*

The London DDPO HC Partnership has been a driving force in getting hate crime against Disabled people on the agenda. We are the only partnership of its kind in the UK, providing training and support to community organisations to help Disabled victims recognise, report and recover from hate crime as well as policy and campaigning. How can MOPAC ensure the longevity and sustainability of partnerships like ours?

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