

Government's progress on the recommendations from the Equality and Human Rights Commission Inquiry into disability related harassment



Contents

Introduction	3
Progress Updates	6
Core Recommendations	6
Criminal Justice System	16
Prosecution Service	18
Special Measures	
The Courts and National Offender Management Service	19
Wider Government	20
Office for Disability Issues	20
The Department of Health	
The Department for Communities and Local Government	21
The Department for Education	22
The Department for Culture Media and Sport	24
The Department for Transport	25

Introduction

1. In July 2012, the Government published its response to the Equality and Human Rights Commission (EHRC) recommendations from its Inquiry into disability related harassment. Our response set out our commitment to tackle disability related harassment and how we planned to take forward work to address the issues identified, including through *Challenge it, Report it, Stop it* - the Government's plan to tackle hate crime.

2. Over the last year, we have made significant progress in a number of areas to identify gaps and improve our response to disability equality, change negative attitudes and provide support for disabled people and disabled people's organisations. However, we recognise that there is still more to do and we will continue to work in partnership with the Commission and other agencies to make progress on this important issue.

3. Official Statistics on hate crime, which include disability hate crime, show that in 2011/12 1,744 (4%) of hate crimes recorded by the police in England and Wales were disability related. This suggests a substantial gap in reporting when compared to the Crime Survey estimates of 65,000 incidents each year. One of our key objectives is to build victim confidence to come forward and report incidents. Overtime this data will help Police and Crime Commissioners, police forces and other criminal justice agencies to develop a better picture of where disability hate crime is happening and help to channel resources appropriately.

4. The Government's overarching approach to ensure equality for disabled people has been set out in a series of documents. Last September, the Office for Disability Issues (ODI) published two documents as part of the first phase of the development of the new cross-government Disability Strategy: *'Fulfilling Potential, the Discussions So Far and Fulfilling Potential: next steps.* These documents provide a response to the concerns of disabled people and disabled people's organisations and outlined the Government's strategic vision and principle. In recent months, the Department has also published *Fulfilling Potential – Making it Happen*, alongside *Fulfilling Potential: Making it Happen Action Plan*, which looks at how the Strategy will be delivered. The ODI has worked with a wide range of disabled people, and their organisations and colleagues across government to develop Fulfilling Potential. This has ensured that the Strategy focuses on the issues most important to disabled people

5. Other action we have taken to tackle hate crime and disability related harassment cuts across the police and other criminal justice agencies and health and social care and includes the following:

• In December 2012, we amended Schedule 21 of the Criminal Justice Act 2003 to double the current starting point for disability and transgender hate crime murders - ensuring that murders motivated by hatred or hostility

towards disabled or transgender victims have the same starting point as for murders aggravated by race, religion and sexual orientation.

- The Justice Secretary asked the Law Commission to review the existing hate crime offences and to examine the case for extending the legislation to create other specific offences, including stirring up hatred on the grounds of disability and separate aggravated offences also covering disability hate crime. As part of its review, the Law Commission recently undertook a public consultation process involving engagement with disabled people's organisations and the Government's Independent Advisory Group on Hate Crime. The Commission is due to report on its findings from the exercise by spring 2014.
- Following the publication of the Criminal Justice Joint Inspection (CJJI) on disability hate crime led by Her Majesty's Crown Prosecution Service Inspectorate (HMCPSI) in March, criminal justice agencies continue to explore ways to improve the response for victims of disability hate crime. The report made a number of recommendations for the police, the Crown Prosecution Service (CPS) and Probation Trusts to do more to ensure that disability hate crime is treated on an equal footing with other hate crimes, and that victims have the confidence to report crimes.
- In response to the EHRC's Inquiry and more recently the CJJI, the CPS has developed its disability hate crime action plan, which is structured around key themes, including: leadership; data; support; good practice and innovation; performance; victims and witnesses; and partnership working. The action plan will be overseen by the Community Accountability Forum (CAF), chaired by the Chief Executive of the CPS, which includes organisations and individuals with expertise and experience in equality and diversity matters.
- The police have made improvements to the way they record hate crimes and are committed to ensuring that cases of disability hate crime are identified and recorded to the same level as other hate crimes. The police are also working more closely with the CPS to review and identify disability hate crime cases in order to learn lessons and promote greater consistency of case handling in the future.
- The National Offender Management Service published its Hate Crime Framework in July 2013. The Framework applies to offender management in both the community and in custody and sets out expectations in relation to identification, assessment, provision of interventions and management of offenders convicted of all types of hate crime, including that which is disability related.
- Following a public consultation, on 29 October 2013, the Government published a new Code of Practice for Victims' of Crime. The new Code aims to give victims of crime clearer entitlements from criminal justice agencies and targets resources at victims who need the most help and support. The Code is written with the victim as the target audience. It includes an enhanced level of service for victims of the most serious crime, and persistently targeted victims,

including victims of a sustained campaign of harassment, and vulnerable or intimidated victims, such as those with a physical disability or physical disorder.

- The abuse that took place at Winterbourne View Hospital and the prosecution of the former members of staff, highlight the importance of ensuring that key partners, including health and social care have a clear understanding of disability hate crime, and how to identify and deal with cases of abuse involving people with learning disabilities. The Government published its final report into the reviews of the Hospital in December 2012, and this included actions to ensure that staff are aware of and know how to raise concerns of disability hate crime.
- The Care Bill was introduced into the House of Lords in May and takes forward the Government's commitments to reform social care legislation and to drive up the quality of care. It includes proposals to require all local authorities to have Safeguarding Adults Board (SAB) with, as a minimum, representatives from the local authority, clinical commissioning group and the police. SAB's will also be required to produce a safeguarding plan, and report progress on it annually. The Bill completed its passage through the House of Lords on 29 October.

6. In partnership with the Independent Advisory Group we have carried out a review of *Challenge it, Report it, Stop it -* the Government's hate crime action plan. We expect to publish a progress report and refresh of the plan by the end of the year.

7. This update provides an overview of the Government's specific achievements to address hate crime and disability-related harassment to date, including case study examples and should be read in conjunction with *Fulfilling Potential* – Making it *Happen action plan.*

Core Recommendations	
1. There is real ownership of the issue apparent in organisations critical to dealing with	
harassment. Leaders show strong personal commitment and determination to deliver change	
Commitment	Update
1.1 Implement the Crown Prosecution Service (CPS) Disability Hate Crime Action Plan	The CPS Disability Hate Crime Action Plan was drafted in immediate response to the Inquiry's report in early 2012 and shared with colleagues on the Inquiry team. Following the publication of Criminal Justice Joint Inspection (CJJI) on disability hate crime in March 2013, the action plan was refreshed in light of the inspection's findings and recommendations. The findings and recommendations from the report can be found at: <u>http://www.hmcpsi.gov.uk/documents/reports/CJJI_THM/BOT_J/CJJI_DHC_Mar13_rpt.pdf</u> .
	The Plan is structured around several themes: leadership, data, support, good practice and innovation, performance, victims and witnesses and partnership working. It has had the benefit of considerable internal and external focus, and has been agreed by and will be overseen by the Community Accountability Forum chaired by the Chief Executive of the CPS. The Forum comprises organisations and individuals with expertise and experience in equality and diversity matters.
	The work of external oversight is overseen by our Chief Executive as chair of the Community Accountability Forum. We also benefit from a named Hate Crime Champion at Chief Crown Prosecutor level able to provide support externally and internally. Also at an Area level, we have a network of Hate Crime Coordinators (HCC's) and hate crime leads some at Deputy Chief Crown Prosecutor level and all experienced prosecutors.
	We have also developed policy in conjunction with communities and have now refreshed both policy and guidance in light of the EHRC Inquiry and CJJI inspection. We have encouraged a proactive quality assurance role for HCCs and will now build on this approach with more targeted and focused attention on consistency across all CPS Areas.
1.2 HM Courts and Tribunals Service (HMCTS) is in the process of appointing a Board level champion for equality and diversity, including those issues related to disability across the organisation	HMCTS has appointed an Equality and Diversity Champion, who sits at Board level. The Champion supports equality and disability work to promote the visibility and profile of Equality and Diversity across HMCTS.

Core Recommendations	
2. Definitive data is available which spells out the scale, severity and nature of disability harassment and enables better monitoring of the performance of those responsible for dealing with it	
Commitment	Update
2.1 Publish Official Statistics on police recorded hate crimes	In September 2012, the Home Office (HO) published the first set of Official Statistics on hate crimes recorded by police forces in England and Wales in 2011/12. The figures show that 43,748 hate crimes were recorded in 2011/12. Of those, 1,744 were disability hate crimes. Further details of the data can be found at: https://www.gov.uk/government/publications/hate-crimes- england-and-wales-2011-to-20122
2.2 The Ministry of Justice (MoJ) and HMCTS are working together with the CPS to explore opportunities for improved sharing and collection of data concerning the prosecution of perpetrators	Since July 2012, markers have been included on Libra, the Magistrates Court data system to allow courts to identify when a crime has been treated as a disability (or other type of) hate crime. A guidance document was issued to court staff to encourage adoption of the use of the markers. During Autumn 2013, data from the first year (July 2012 - June 2013) will be analysed and compared to police recorded crime hate crime and CPS prosecution data to determine the extent of its use.
2.3 The CPS is also working with the police to explore how the recording of data regarding individual victims of hate crime can be improved, and to consider the most appropriate way of collecting data on the protected characteristics of all victims of crime	In response to the findings from the CJJI into disability hate crime, the CPS and the National Policing Lead (NPL) on Hate Crime agreed to undertake an audit of disability hate crime cases in 11 police force areas and related CPS areas. This exercise is underway and is examining relevant data on disability hate crime from initial report to prosecution outcome, including finalised case files. The exercise aims to: improve the understanding of attrition rates; provide greater transparency in reporting hate crime performance; and promote greater consistency of case handling. A summary report of the audit will be produced to help inform police and CPS leaders considerations in future cases. This report is expected to be completed during November 2013.
2.4 The Cross -Government Hate Crime Programme (CGHCP) will hold a seminar with key academics and stakeholders, to consider the evidence and research available on disability hate crime	A seminar bringing together a broad group of academics and officials to consider the evidence and research available on disability hate crime was held in September 2012, at Leicester University. The group was then later formally established as the International Network for Hate Studies. The Network held its first meeting in Birmingham in May 2013 and has agreed its Terms of Membership. It will host an international hate crime conference called 'Understanding Hate Crime: Research, Policy & Practice' at the University of Sussex in May 2014. The group has established a website www.internationalhatestudies.com to facilitate information sharing and to encourage joint working.

3. The criminal justice system is more accessible and responsive to victims and disabled people and provides effective support to them.

people and provides effective support to them.		
Commitment	Update	
3.1 CPS to engage with communities at risk of hate crime to raise awareness of the law on hate crime	The Navigators' Workshops were run as pilots during the course of 2012/13 in 5 locations. The workshops (a project in collaboration with Hate Crime Coordinators from two CPS Areas) aimed to address the issue of under-reporting and specifically the lack of awareness of what was meant by disability hate crime. The target audience was both general and specialist with a range of frontline points of contact such as, health workers and housing officers as well as general and specialist advice agencies, Disabled People's Organisations and national disability charities. Workshop material, including a briefing for frontline agency staff (developed with the input of workshop delegates) has been circulated to CPS Areas with an invitation to build them into their work on addressing under-reporting in the coming year.	
3.2 Work with voluntary sector	See Action 6.3.21 Fulfilling Potential: Making it Happen	
organisations to establish, review and disseminate good practice on alternative methods of reporting hate crime.	for progress update: http://odi.dwp.gov.uk/fulfilling-potential/index.php The Government continues to support the development of True Vision, the online police led hate crime reporting and resource tool. Examples of successful initiatives that have been promoted through the site, include the production of a video for British Sign Language users, which was developed in collaboration with a local partnership. The video was promoted through social media advertising which targeted 16,000 BSL users. After 28 days 688 of those users had downloaded the video. A series of workshops have been carried out during the year, by the police and MoJ officials together with people with learning disabilities to review current information on True Vision and to identify gaps.	
3.3 Work to identify good practice from MoJ and HO project funds for wider dissemination	 Officials continue to visit projects funded under the Victim and Witness Fund in order to identify good practice for wider dissemination. Funding under the Community Action Against Crime Innovation Fund ended in March this year and projects were required to complete a self evaluation, including how the objectives were met and any lessons learned. All hate crime projects, including those focused specifically on tackling disability hate crime are currently being considered to identify good practice. In February, as part of the Strengthening Disabled People's User Led Organisation's Programme (DPULO), the Office for Disability hate crime case studies which demonstrate how DPULOs have and are making a difference in their local communities. Further details can be found at: http://odi.dwp.gov.uk/odi-projects/user-led-organisations/difference-programme-is-making.php. 	

Core Recommendations	
3. The criminal justice system is more accessible and responsive to victims and disabled	
people and provides effective supp	
Commitment	Update
3.4 Review victims' services, including the Code of Practice for Victims of Crime to ensure that all victims receive the most appropriate support throughout the criminal justice system process. Getting it	On the 29 th of October 2013, the MoJ launched a new Code of Practice for Victims of Crime. This followed the <i>Improving</i> <i>the Code of Practice for Victims of Crime</i> public consultation which ran from 29 March - 10 May 2013. The new Code will come into force later this year.
right for victims and witnesses	The Victims' Code sets out the services to be provided in England and Wales to victims of Crime by the criminal justice agencies. The new Code replaces the 2006 Code which was out of date, did not reflect new practice and was overly prescriptive. Written with victims as the target audience, the new Code is victim-focussed, and designed to enable victims of crime to immediately identify what their entitlements are throughout their journey and from whom to expect to receive them.
	The new Victims' Code will provide an enhanced service, such as quicker updates on the status of a victim's case, for three categories of victim most in need. These are victims of the most serious crime, the most persistently targeted victims, including victims suffering from a sustained campaign of harassment, and vulnerable or intimidated victims, such as those suffering from a physical disability or a mental disorder within the meaning of the Mental Health Act 1983. The new Code is written in a simplified language in order to make it easily accessible to all. We are also developing an Easy Read guide to the Code, which will use simple language, visual and pictorial illustrations in order to make the Code more easily understandable by people with learning or communication difficulties.
	More information on the new Code and the consultation we held can be found on the Gov.uk website at: <u>https://www.gov.uk/government/publications/the-code-of-practice-for-victims-of-crime</u> .
	From October 2014 the majority of support services for victims of crime will be commissioned locally by Police and Crime Commissioners based on local needs and priorities. Additionally the MoJ will commission a number of national services including a homicide service, court based witness service and a service for victims of human trafficking.

people and provides effective support to them.	
Commitment	Update
3.5 The CPS is also currently conducting a review of its commitments for victims and witnesses	Revision of Code of Practice for Victims of Crime - the targeted approach to victim and witness care outlined below is supported by the MoJ's revised Victim's Code. The CPS is working with the MoJ to revise the Code, which will provide clarity for victims in understanding their entitlements.
	Clarifying our service and guidance - following the successful evaluation of a pilot study in 2012 and with the support of the NPL on Hate Crime, the CPS has implemented nationally a revised service to victims and witnesses, focusing the support Witness Care Units (WCU) give to those victims and witnesses in greatest need, including the victims of hate crime. Members of the joint CPS/police Criminal Justice System Efficiency Team have been evaluating implementation and monitoring compliance with the revised minimum requirements from June 2013.
	In July 2012, the CPS published a framework document outlining the key elements of witness care, providing links to the more detailed legal guidance where necessary. The framework is primarily to assist front line practitioners in understanding and delivering their CPS witness care commitments, thereby ensuring that the CPS complies with our Core Quality Standards.
	Witness Care Unit Manual The CPS together with the NPL on Hate Crime is developing a WCU manual which is designed to assist Witness Care Officers and managers in their day-to-day dealings with victims and witnesses.

4. We have a better understanding of the motivations and circumstances of perpetrators and are able to more effectively design interventions	
Commitment	Update
4.1 ODI is considering the feasibility of including a disability module of questions in the 2013 British Social Attitudes Surveys (BSAS), which aims to measure public attitudes towards disabled people and	ODI has since delayed deciding whether to add a disability module of questions to the British Social Attitudes Surveys (BSAS). This is to allow time for the Fulfilling Potential Indicators to be established, including via publication of the first progress report in Spring 2014.
disability	The progress reporting will allow us to consult stakeholders and identify evidence gaps, including in relation to areas where there may be concern about progress. In turn, this will enable us to consider what, if any, questions should be added to BSAS to help address such evidence gaps.
4.2 The CGHCP will support and keep abreast of research undertaken by external bodies. The Programme is engaged with a pilot research project proposed by Nottingham Trent University, which aims to gain an understanding of the circumstances and motivations of disability hate crime offenders	The pilot research project in Nottingham is ongoing, including work to identify appropriate offenders in sufficient numbers to make the findings relevant. Attempts were being made to broaden the study area to take in the region but a formal agreement is yet to be made.

3. The criminal justice system is more accessible and responsive to victims and disabled

4. We have a better understanding of the motivations and circumstances of perpetrators and are able to more effectively design interventions	
Commitment	Update
4.3 The Welsh Government commissioned research in Wales on the perpetrators of hate crime which is being taken forward jointly between Cardiff and Manchester Universities	The Welsh Government published the findings from the study into perpetrators of hate crime in July 2013. Further details can be found on the link attached: <u>http://wales.gov.uk/about/aboutresearch/social/latestresearch/understanding-who-commits-hate-crime/?lang=en</u> Some of the key findings from the research are as follows:
	 It identified four broad categories of offender, the 'thrill seekers', 'area or territory defenders', 'retaliatory offenders' and 'mission offenders'. The majority of hate crime offenders in the UK are white, male and under 25. Hate crime offenders convicted of more serious and violent offences tended to be older. Approximately 84% of all hate crime is racially motivated. Perpetrators of racial and religious hate crimes and homophobic and transphobic hate crimes, are somewhat more likely than those who commit disability hate crime to commit public order offences and offences against the person. Those who commit disability hate crime are more likely than the perpetrators of other types of hate crime to commit sexual offences, theft and handling, and robbery.
	The Minister for Communities and Tackling Poverty launched the 'Tackling Hate Crimes and incidents: A Framework for action' in July 2013. The consultation period close on Friday October 18th. The responses will be collated and published in Spring 2014 along with a Delivery Action Plan. The Framework includes specific proposals to work with partners to reduce the incidence of disability related bullying and hate crime'. The consultation document can be found at: http://wales.gov.uk/consultations/equality/130711-hate-crime- framework-consul/?lang=en
4.4 Work with Local Criminal Justice Boards to identify opportunities for supporting projects that consider the motivations and circumstances of perpetrators	In addition to the work in Nottinghamshire outlined in 4.2 above, the College of Policing has completed a study of disability hate crimes entitled 'Understanding the perpetrators of disability hate crime' and has used this to develop a data analysis toolkit for all forces.
	The findings will be presented to force policy leads at a NPL 'Stock-take' event in November 2013. The event will seek to share knowledge across force areas and identify those who are making progress.
4.5 National Offender Management Service (NOMS) work to explore the motivations of hate crime offenders(Not a specific recommendation in	NOMS is researching the profile of hate crime offenders, including those motivated by prejudice or hostility based on disability or perceived disability, in order to enable better targeting of interventions.
the Government response)	

Core Recommendations	
5. Work with disabled people and their organisations and other stakeholders to help change	
perceptions of disabled people in the wider community	
Commitment	Update
5.1 Publish a summary of responses to ' <i>Fulfilling Potential</i> ' and a summary of current and planned actions across Government. Alongside this, we will outline our next steps based upon the issues and ideas disabled people have told us about	In September 2012, the ODI published two documents as part of the next phase in the development of the new cross government Disability Strategy: <i>The 'Fulfilling Potential, the Discussions So Far'</i> set out actions that are already being taken forward by the Government to respond to the concerns raised by disabled people and disabled people's organisations and <i>Fulfilling Potential: next steps</i> provides the Government's strategic vision and principles.
	In July 2013, the ODI published Fulfilling Potential - Making it Happen, alongside the Fulfilling Potential: Making it Happen Action Plan. It emphasises the need for innovative cross sector partnerships with disabled people and their organisations and promoting new ways of working to deliver meaningful outcomes. It underscores the Government's commitment to the UN Convention on the Rights of Disabled People to bring about the changes needed in communities that have a real and lasting effect on the day-to-day lives of disabled people.
	It also harnesses the inspirational power of the London 2012 Olympic and Paralympic Games to deliver further lasting change to attitudes and aspirations.
	The Action plan captures Government progress on current disability strategy activities and commitments, including those made in response to the EHRC's Inquiry into disability-related harassment. It also sets out where we are encouraging and supporting innovative work through the <u>Disability Action Alliance</u> , and disabled people's user-led organisations.
	The Action Plan can be downloaded from the ODI website at: <u>http://odi.dwp.gov.uk/fulfilling-potential/index.php</u>
5.2 In Autumn 2012, the ODI will publish an analytical document drawing on statistics and research, to explore the nature of disability in the UK today, and following on from this, and continuing to draw on joint working with disabled people, we will publish a further strategic document and action plan in the new year	ODI published 'Fulfilling Potential: Building a deeper understanding of disability in the UK today' in February. It provides an analysis of the current evidence on disability in the UK to help inform the development of outcomes and indicators for the Fulfilling Potential actions. The evidence is structured around the Fulfilling Potential: Next Steps themes of early intervention; choice and control and inclusive communities. Fulfilling Potential: Building a Deeper understanding can be downloaded from the ODI website at: http://odi.dwp.gov.uk/fulfilling-potential/index.php

5. Work with disabled people and their organisations and other stakeholders to help change perceptions of disabled people in the wider community

Commitment	Update
5.3 Use the 2012 Olympic and	See Action 6.6.1 & 6.6.2 Fulfilling Potential: Making it
Paralympic Games to change	Happen for progress update:
perceptions of disabled people	http://odi.dwp.gov.uk/fulfilling-potential/index.php
5.4 Working with Disabled People's	See Action 6.6.3 - Fulfilling Potential: Making it Happen for
Organisations and supporting other	progress update:
organisations, such as the Press	http://odi.dwp.gov.uk/fulfilling-potential/index.php
Complaints Commission and the	
organisation that will replace it, to	The ODI established a dialogue with the Press Complaints
address negative media stereotypes	Commission, including sharing good practice, for example,
of disabled people	the disability hate crime guidance has been shared with the
	Commission.
	The ODI continues to work with Civil Service Learning and
	Government Communications Network to make officials,
	policy-makers and communicators across government aware
	of disability.

6. All frontline staff who may be required to recognise and respond to issues of disability related harassment have received proper training	
Commitment	Update
Commitment 6.1 The Department for Transport (DfT) will seek to ensure that existing disability awareness training provided by transport operators includes modules on disability- related harassment, and involving relevant stakeholders.	Buses: Since September 2008 all professional bus and coach drivers operating in the UK have been required to hold a Certificate of Professional Competence (CPC) as a requirement of the EU Directive 2003/59. In order to keep their Driver CPC, drivers are required to carry out 35 hours of periodic training every five years. Disability Awareness training is available as part of the periodic training although the EU Directive does not stipulate that there should be any compulsory aspect to Periodic Training. The training materials for this module have been developed to reflect the content and best practice set out in the Disability Equality and Awareness Training Framework for Transport Staff developed by the Disabled Persons Transport Advisory Committee (DPTAC). We recommend that transport operators involve disabled people themselves in the training, and that both frontline and management staff are trained and their skills regularly updated.
	On 9th July 2013, the Parliamentary Under Secretary of State for Transport wrote to bus industry representatives to re- iterate the Government's support for disability awareness training and encourage bus and coach drivers to undertake such training courses at the earliest opportunity. The Department has also committed to review the uptake of disability awareness training amongst bus and coach drivers by March 2014.
	Rail: Each train operator is required to have a Disabled Persons' Protection policy as part of their licence to operate. This commits them to providing disability awareness training to all passenger facing staff and managers. We do not prescribe a detailed syllabus for this training, which allows each operator to tailor it for their own needs and to update their materials as necessary, although ATOC have produced a training DVD that is available to all operators.

Core Recommendations	
6. All frontline staff who may be required to recognise and respond to issues of disability	
related harassment have received p Commitment	Update
6.2 The DfT will explore with the Traffic Commissioner the	The Department is engaged in ongoing discussions with The Senior Traffic Commissioner and the Confederation of
development of a Code of Practice	Passenger Transport. We will be reporting further in the
for bus operators aimed at reducing	Accessibility Action Plan progress report in December 2013.
harassment on the bus network	Accessibility Action Fian progress report in December 2013.
6.3 As part of a wider reform of adult	See update in section 17.1.
social care law, we plan to introduce	See update in Section 17.1.
primary legislation that will both	
strengthen the role of statutory	
organisations in this area and make	
them more locally accountable	
6.4 The CPS is planning to review	Work is currently underway to amend existing training
the training on hate crime currently	material in light of the disability hate crime policy/guidance
available for its staff this summer	refresh. Discussions are also on-going with Learning and
	Development colleagues regarding the options for delivery of
	additional support to prosecutors.
6.5 HMCTS is reviewing its training	General equality and diversity training is mandatory for all
provision for frontline staff with a	HMCTS staff. Further equality and diversity training, focusing
view to building on its existing	more specifically on disability, is now also available to staff.
equality and diversity training	Staff are also issued with detailed guidance on making
	reasonable adjustments for court and tribunal users and
	disability fact sheets to support them in assisting court users
	with disabilities. This guidance has recently been updated,
	with input from both internal and external contacts on
	disability and learning difficulties.
6.6 Work with voluntary organisations to identify practitioner	This work is ongoing and officials continue to present at public
roles where training on hate crime is	events and regularly engage with voluntary sector organisations to identify relevant practitioner roles, including
not currently available, and to	through the projects funded under the MoJ Victim and
develop tools to assist them in	Witness Fund.
dealing with hate crime cases	
	The UK was also a partner in 'Finding Facts', an EU funded
	programme established to develop training for third-party
	reporting centres. A training programme was produced and
	delivered to a range of community groups and resources to
	support new groups are available on the True Vision website.

Core Recommendations	
7. Promising approaches to preventing and responding to harassment have been evaluated and disseminated. We recommend that public bodies conduct rigorous evaluation of their current response and prevention projects, so that a shared knowledge can be built about the most effective routes to deal with harassment and reduce its occurrence	
Commitment	Update
7.1 Share local examples of good practice, including from HO and MoJ funded projects	See update in section 3.3.
7.2 It is important that schools work in partnership and learn from one another, and this is one of the key principles underpinning the Department for Education's reforms	In line with the Government's overall approach of trusting professionals and reducing the bureaucratic burdens on schools, Ministers have been clear that they do not wish to dictate specific approaches from the centre, but empower schools to identify the challenges, particular to them.
	The updated guidance provided to schools in July 2011, will help schools tackle <u>all</u> forms of bullying. It summarises schools' legal obligations and powers in relation to bullying, outlines general principles adopted by successful schools and signposts them to resources and key anti-bullying organisations.
	The Department has also provided £4m of funding to four anti-bullying organisations over two years to tackle bullying in schools:
	 £1.5m for Beatbullying to train 3,500 11-17 year olds over two years to act as mentors. £800k for the Diana Award to identify and train 10,000 pupils to act as anti-bullying ambassadors; just over £250k to Kidscape who will work in 9 of London's most economically deprived boroughs to train primary school professionals to enable them to effectively deliver preventative and remedial strategies; and £1.5m to The National Children's Bureau consortium who will focus on those bullied children and young people with SEN and/or disabilities. It will work with around 900 schools, parents, carers and school staff to reduce the bullying of these children and its impact when it does occur.
7.3 The DfT will be working with the industry and transport authorities such as Passenger Transport Executives to identify how incidents can best be reported, building on existing good practice.	Work is ongoing in this area and we will be reporting further in the Accessibility Action Plan progress report in December 2013.

Criminal Justice System 8. Commission primary research on disability related harassment to help fill the knowledge	
8.1 Currently reviewing existing sources of data to identify any priority gaps	See update in section 2.4.
 8.2 The MoJ is engaged with a pilot research project in Nottingham, which will examine some of these issues at a local level, with a view to disseminating the findings to other areas 9. Take the lead in working with other areas 	See update in section 4.2.
Commitment	Update
9.1 Work with police forces, councils and housing providers to improve handling of public calls about anti- social behaviour, to identify possible hate crimes and individuals who are at risk.	The Anti-social Behaviour, Crime and Policing Bill, which was introduced into Parliament in May includes proposals for a Community Trigger. The community trigger will place a new duty on agencies including local authorities, police, health bodies and registered providers of social housing to work together to review and resolve persistent cases of anti-social behaviour (ASB). It will bring agencies together to take a more joined up, problem-solving approach to find a solution for the victim. In particular, it will take into account the vulnerability of the victim and the persistence of the ASB. Trials took place in four areas of the country in 2012/13 and a report was published in May 2013, highlighting lessons identified for agencies setting up their community trigger procedures. Two of the trial areas specifically included hate incidents in their community trigger, so that it could be used if someone had reported a hate incident and no action had been taken by the agency it was reported to. Further details of the trials can be found in the summary report at: https://www.gov.uk/government/publications/empowering- community-trigger-trials.
9.2 The CPS and the NPL on Hate Crime are also committed to developing closer working relationships across this agenda and are exploring how this might work in practice.	See update in section 2.3.

10. Amend Schedule 21 guidance to give parity in sentencing guidelines for all types of identity-based hate crime murders

Conduct a review to consider the potential benefits of specific offences motivated by hostility towards disability

Conduct a review to consider the benefits of an 'incitement' offence, particularly as a potential measure to address cyber-bullying

Commitments	Update
	•
10.1 Amend the Criminal Justice Act 2003, so that murders motivated by	Section 65 of the Legal Aid, Sentencing and Punishment of Offender Act 2012, which cover these amendments, was
hatred or hostility towards disabled	implemented on 3 December 2012.
or transgender victims have a	
sentencing starting point of 30 years.	
10.2 Conduct a review of sentences	The Law Commission agreed to a request from the Justice
for offences motivated by hostility to	Secretary to undertake a review of existing hate crime
consider whether there is a need for	offences to examine the case for extending the legislation.
new specific offences	
	The Law Commission published a consultation paper in June
	2013 seeking views on whether there is a case for creating
	specific offences of stirring up hatred on the grounds of
	disability and transgender and separate aggravated offences
	to cover disability, sexual orientation and transgender.
	The development of the consultation paper involved
	engagement with disabled people's organisations and the
	Commission also hosted a meeting with the Independent
	Advisory Group on Hate Crime in July 2013.
	The consultation period closed at the end of September. A
	summary report of the findings and recommendations will be
	submitted to the MoJ in February/March 2014. Further
	information can be found at:
	http://lawcommission.justice.gov.uk/consultations/hate_crime. htm.
10.3 Work with industry, the police	Representatives from the police and the Government's
and EU institutions and other	Independent Advisory Group on hate crime have joined an
international organisations to	international Cyber-hate Task Group. The Group brings
develop a programme of work to	together social media and internet executives to seek
tackle hate crime on the internet.	opportunities to work together to reduce the harm caused by
	hate on the internet. The Group is still in its infancy, but has
	already seen some important changes from some of the
	leading social media companies.
	Examples of the work to date includes a refresh of the
	Facebook approach to hate material, which can be found on
	True Vision at:
	http://www.report-
	it.org.uk/facebook_announce_new_approach_to_hate_materi
	al
	The Disector of Dublic Descentions of final subjects of
	The Director of Public Prosecution's final guidelines on
	prosecuting cases involving communications sent via social media were published in June 2013, following a three month
	consultation exercise. The guidelines underline the potential
	for hate crime to feature in the context of these prosecutions
	and the relevance of the Code for Crown Prosecutors in this
	regard. A copy of the guidelines can be found at:
	http://www.cps.gov.uk/legal/a_to_c/communications_sent_via
	<u>social media/index.html</u>

Prosecution Services		
11. Information on how many reported incidents in a local authority area were recorded as crimes and how many have resulted in prosecution should be published		
Commitment	Update	
11.1 The CPS will consider with the NPL on Hate Crime and police forces whether it is possible to improve the geographical matching of data on recorded crimes and prosecutions	See update in section 2.2.	
12. The new sentencing guidelines in England and Wales provide an opportunity to re-assess and monitor consistency of sentencing for disability-related harassment offences. We recommend those opportunities are taken up to help provide an overview of the scale of the issue and how it is addressed		
Commitment	Update	
12.1 Use the Council's Crown Court Sentencing Survey to monitor consistency of sentencing for offences motivated by disability	The 2011 and 2012 results from the Crown Court Sentencing Survey were published on 24 th May 2012 and 30 th May 2013 respectively. Copies of the survey's can be found on the Sentencing Council's website <u>http://sentencingcouncil.judiciary.gov.uk/index.htm</u> . In the 2012 results publication, the section on aggravating and mitigating factors shows for each offence form type the top five aggravating factors that were used by judges in 2012. "Motivated by disability" did not feature in the top five aggravating factors in any offence group.	

Special Measures 13. Current arrangements for 'special measures' to support victims should be reviewed and revised. They should be mainstreamed into the provision of criminal justice services in such a way that they provide parity for disabled and non-disabled people in accessing the services	
Commitment	Update
13.1 The CPS has carried out some internal research into the experience of applying for special measures and the draft report and recommendations are currently being considered.	Following its internal research exercise, the CPS will produce revised legal guidance on special measures by the end of the year, and a range of examples on the use of Registered Intermediaries will be produced alongside this.

The Courts and National Offender Management Service

14. Disabled people should have access to the court system and their experiences should form part of any system for evaluating the courts and criminal justice system

We would like to see the courts service do more to proactively find ways in which disabled people can participate in improving the administration of justice in their areas

Commitment	Update	
14.1 HMCTS is currently developing a Strategic Vision which will ensure that disabled people are engaged in developing future measures, such as customer journey mapping and community engagement groups, to ensure that their views on the accessibility of court proceedings are effectively captured	The key principles of HMCTS's long-term vision is set out in its business plan. One of those key principles is to: 'Ensure that future services we develop or commission have continuous improvement and Lean principles at their heart. This means a continued focus on the needs of our customers and users as well as on cost effectiveness. Court user groups are held to encourage user feedback. A copy of HMCTS Business Plan 2013/14 can be found at: <u>http://www.justice.gov.uk/downloads/publications/corporate- reports/hmcts/2013/business-plan-13-14.pdf</u>	
Ma	anaging Repeat Offenders	
15. Appropriate sanctions should always be applied to convicted offenders at the earliest stage and should take account of their previous convictions. All perpetrators should be made aware of the full consequences of any repeat offending during sentencing and through their contacts with NOMS and other agencies		
Commitment	Update	
 15.1 Produce a Hate Crime framework that will assist offender managers in identifying, assessing, intervening and managing people involved in hate related offending 15.2 Other NOMS work and example of good practice 	NOMS published its Hate Crime Framework (for staff) in July 2013. The Framework applies to offender management in both the community and in custody and sets out expectations in relation to identification, assessment, provision of interventions and management of offenders convicted of all types of hate crime, including disability related hate crime. Work which supports the introduction of the Framework includes projects looking at the profile of hate crime offenders and the effectiveness of current interventions for hate crime. The rollout of the national Delius case recording system provides a means of recording, for offenders in the community, whether or not offending was motivated by prejudice or hostility based on disability or perceived disability. NOMS will be looking at a similar arrangement for cases in	
	custody. <u>Good practice example</u> Norfolk and Suffolk Probation Trust (NSPT) identified one of its Equality Objectives for 2012-15 ' <i>To develop a work</i> <i>programme to address hate crime</i> '. Amongst the initiatives are: comprehensive guidance for staff on hate crime; the introduction of a hate crime 'flag' on recording systems enabling NSPT to share information more widely with other agencies; and bespoke posters which use clear and inclusive language and images and are displayed in all Probation sites, advising all visitors what a hate crime is and how to report it. The Trust is also planning delivery of 'Think Again ' (currently being delivered and evaluated at West Yorkshire Probation Trust), which is a ten-module intervention, informed by research and evidence, that is aimed at rehabilitating hate crime perpetrators.	

WIDER GOVERNMENT Office for Disability Issues	
16. The Office for Disability Issues should, with other departments and disabled people's organisations, conduct a review of all statutory and common law restrictions on the public participation of disabled people, and other laws which unnecessarily and inappropriately treat disabled people differently to others	
Commitment	Update
16.1 The ODI is reviewing legislation that may treat disabled people differently to others as part of the work it is undertaking on the development of <i>Fulfilling Potential</i>	Fulfilling Potential: Making it Happen (July 2013) was developed in partnership with disabled people's user led organisations and government departments. The action plan addresses the issues disabled people told us about and offers solutions including on legislation where appropriate. A copy of the action plan can be found at: http://odi.dwp.gov.uk/fulfilling-potential/index.php

Department of Health

17. Review the guidelines for serious case reviews to ensure that such harassment is always acted upon in prevention campaigns and in future police investigations. Serious case reviews should also be mandatory for cases involving adults at risk (as already applies to cases involving children)

Revise the 'No Secrets' guidelines in England as suggested by the Law Commission. In the longer-term, 'No Secrets' should be replaced by a rights based approach (such as the provisions in the Adult Support and Protection (Scotland) Act (2007), replacing a perception of individual vulnerability with one which sees disabled people as being 'at risk of harm'

Review eligibility criteria for social services to better include support for social inclusion. Ideally, eligibility criteria should not be focused on vulnerability or risk of harm, but instead focus on an individual's circumstances preventing them from fully achieving their human rights, and targeting resources to enable them to do so

Commitment	Update
17.1 The Social Care White Paper will set out the Government's approach to reforming our care and support system, including issues around safeguarding adults and the	The Care Bill 2013-14, which takes forward the Government's commitments to reform social care legislation and to drive up the quality of care, received its first reading in the House of Lords on 9 May 2013.
eligibility criteria for social care support.	The Bill provides for the development of national eligibility criteria, bringing people greater transparency and consistency across the country. It returned to the House of Lords on 9th October for its Report Stage and Third Reading was held on 29 October.

Department of Health	
18. Adult Safeguarding Boards should be put on a statutory basis	
Commitment	Update
18.1 The Department of Health (DoH) made a commitment to placing Adult Safeguarding Boards on a statutory basis	The Bill requires all local authorities to have Safeguarding Adults Board (SAB) with, as a minimum, representatives from the local authority, clinical commissioning group and the police. SAB's will be required to produce a safeguarding plan, and must report progress on it annually. Where SAB's know or suspect that serious abuse or neglect has contributed to the death or serious harm of an individual, and there is reasonable cause for concern about how SAB members or other persons with relevant care and support functions acted, then SABs will be required to carry out a safeguarding adult review. The aim of the safeguarding adult review will be to learn lessons on how to prevent such occurrences in the future.
	SAB's also have the power to undertake reviews in other circumstances if they so choose.
19. Health services (especially GPs, accident and emergency and ambulance services) should ensure that their safeguarding alerts process is sufficiently robust and staff are adequately trained.	
Commitment	Update
19.1 DoH are looking at how Clinical Commissioning Groups, as part of the authorisation process, will evidence they are working appropriately with the local authority on safeguarding matters	The DoH has worked with NHS England during the authorisation process for clinical commissioning groups to ensure that emerging organisations have the skills and capacity to undertake their statutory responsibilities.

Department for Communities and Local Government	
Commitment	Update
	against disability harassment within tenancy agreements
	If a disabled person is forced to move in order to avoid
	security of tenure should not be adversely affected
20.1 We are looking at how powers	Provisions to introduce a new absolute ground for possession
to tackle perpetrators can be made	to deal with persistent housing related anti-social behaviour
more effective. The Government has	(ASB) and proposals to streamline and improve the existing
recently finished consulting on	toolkit available to the police, social landlords and others to
proposals to introduce a new	tackle ASB are included in the Anti-Social Behaviour, Crime
mandatory power for possession	and Policing Bill.
where housing related anti-social	Ŭ
behaviour has already been proven	The draft Bill underwent pre-legislative scrutiny by the Home
by a court	Affairs Select Committee in February and the ASB, Crime and
20.2 The Government has also	Policing Bill was introduced to Parliament in May. The Bill
consulted on proposals to streamline	completed its passage through the House of Commons on 15
and improve the existing toolkit	October and commenced its passage in the House of Lords
available to the police, social	on 29 October.
landlords and others to tackle ASB	
so that victims and communities can	
be better protected from the serious	
harm caused by criminal and anti-	
social behaviour	
	1

Department for Education	
21. Ofsted should maintain a strong focus on equalities-related areas within school inspections, particularly on identity-based bullying	
Commitment	Update
21.1 Ofsted will publish a bullying survey which considers identity and prejudice based bullying, highlighting areas of good practice	Ofsted published a report on bullying in June last year, along with other supporting material. These can be found at: <u>http://www.ofsted.gov.uk/resources/no-place-for-bullying</u>
which will serve as a guide to the education sector	The aim of this survey was to evaluate the effectiveness of the actions that schools take to create a positive school culture and to prevent and tackle bullying. A large part of the survey focused on pupils' own experiences and understanding of bullying and its effects.
	In addition Ofsted (the school inspection regime) now clearly holds schools to account on how well they deal with behaviour and bullying. The current Ofsted Inspections Framework introduced in 2012 has reduced the criteria for inspections from 27 to just 4, one of which is Behaviour and Safety, including bullying. Inspectors consider pupils' freedom from bullying, harassment and discrimination. This approach will encourage schools to focus on this area. Where necessary it will prompt them to improve.

Department for Education 22. Encourage schools, with the support of local and national leaders of education, to promote an understanding of disability and share good practice with other schools as a matter of course. The designation of teaching schools and excellent leaders such as national and local leaders of education and the new specialist leaders of education will provide a framework in which our best schools and leaders can promote an understanding of disability issues and share good practice	
 22.1 We aim to: create 500 teaching schools by 2014; expand the number of national leaders to 1,000; and create 5,000 SLEs by the end of 2014 	 There are currently: 353 Teaching Schools representing 297 alliances 871 National Leaders of Education (NLEs) 2536 Specialist Leaders of Education (SLE's) Teaching Schools are responsible for the recruitment and brokerage of SLE's. To date, teaching schools have designated the following expertise at middle and senior leader level to support peer colleagues in other schools: 224 SLEs across 94 Local Authority areas have an expertise in Special Education Needs (SEN) 195 SLEs across 80 Local Authority areas have an expertise in behaviour and discipline. Teaching Schools are best placed to identify the needs of schools within their alliances and will use the expertise of these SLEs according to need, including the promotion of disability issues and sharing of the best practice that exists in schools.
	 disabilities prepare for adulthood through challenging low expectations. Clusters members work together through peer to peer learning, prioritizing sharing delivery and resources at a practical level. Over 150 Teaching Schools across the country have also been developing Special Educational Needs and Disability (SEND) provision this year. This builds on the SEN Green Paper's intention to support schools in the development of SEN specialists who will then support clusters of local schools. The outcomes of this work currently underway expect to be: improvement in confidence of teachers and leaders in meeting the needs of children with SEND and in building relationship with and working with parents/carers increased capacity and system leadership that provides a sustainable resource beyond the life of the project increased capacity and expertise in SEN, building on existing models such as SLEs and the SEN scholarship (where alliances have teachers that received this).

Department for Education 23. The growing threat posed by 'cyberbullying' should be recognised and dealt with on the same basis as face to face bullying. This is particularly important for schools to address as many perpetrators are young people				
			Commitment	Update
			23.1 £1.3 million from the Social Action Fund to be given to Beat Bullying to expand and develop their work further	The Government provided funding to tackle cyberbullying in 2012/13 through the Cabinet Office Social Fund. BeatBullying received £1.3 million to run a Cybermentors programme to support young people who are bullied on and off line.
	The Department for Education (DfE) provided £152,506 to the Diana Award in 2012/13 to support its Anti-Bullying Ambassadors programme. This programme empowers young people to take responsibility for changing the attitudes and behaviour of their peers towards bullying. As part of the training the young people consider the different types of bullying, including cyberbullying. Funding has also been provided to Kidscape and the National Children's Bureau to support the organisations in developing projects to tackle all forms of bullying, including cyber-bullying.			
	As part of the changes to computing programmes of study which will be taught from September 2014, e-safety will be taught at all four key stages. It covers responsible, respectful and secure use of technology, as well as ensuring that pupils are taught age-appropriate ways of reporting any concerns they may have about what they see or encounter online. There is progression in the content across the key stages to reflect the different and escalating risks that young people face as they get older (initially relating to online content, then to the conduct of and contact with others).			
	Search powers included in the Education Act 2011 have given teachers stronger powers to tackle cyberbullying by providing a specific power to search for and, if necessary, delete inappropriate images or files on electronic devices, including mobile phones.			

Department for Culture Media and Sport	
Commitment	Update
23.2 Continue the work of the UK Council for Child Internet Safety	The UK Council for Child Internet Safety, of which the board is co-chaired by three Ministers, continues to bring together the most important organisations and internet companies to create a safer online environment for children and young people.
	The Prime Minister has called for responsible behaviour from website owners. The Government expects all social media to have simple mechanisms for reporting abuse, to take actions promptly when abuse is reported and to make it easier for users to turn off anonymous posts. We are pleased to see that Ask.fm has announced changes to its service - an increase in moderation of posts, the reporting button to be more prominently displayed and guidance to help people turn off anonymous postings.

De	Department for Transport		
24. Transport providers should identify ways to design out potential for conflict in new fleet and transport infrastructure design. For example, they should review their vehicles and waiting areas to ensure that conflicts between disabled passengers and those with pushchairs are minimised. They should also ensure that disabled access provisions are clearly identified and enforced and promptly resolve any disputes regarding these			
Commitment	Update		
24.1 The DfT will work with transport operators and disabled passengers to identify existing good practice, such as that being developed by Transport for London, for resolving conflict and ways in which this can be disseminated	Work has commenced on a pilot scheme in partnership with Transport for Greater Manchester focusing on passengers, raising awareness of the priority wheelchair areas on buses, promoting considerate behaviour and encouraging positive attitudes towards disabled people. The campaign, fully funded by DfT (£70k), was launched on 29 August to coincide with the anniversary of the 2012 Paralympic Games. The Shared Space project is being piloted on the Greater Manchester bus network with a view to extending it to Metrolink and rail services in the future. Further details can be found at: http://www.tfgm.com/accessible_transport/Pages/shared_spa ce.aspx		
25. Public transport operators should develop reciprocal reporting arrangements between providers so that people can report harassment experienced at stops, stations and on transport to whichever operator they encounter. They should also develop systems to allow repeat perpetrators to be refused entry to each other's vehicles (similar to those already used			
by licensed premises). Commitment	Update		
25.1 The DfT will work in partnership with the police, the voluntary sector and transport authorities, such as Passenger Transport Executives to identify an online incident reporting tool that could potentially be used nationally, building on existing practice	Progress to develop a specific passenger transport focussed reporting tool has been slow - due to lack of resources. However, victims of hate crime on transport can report incidents online via the police's True Vision website.		
25.2 The DfT will also consider how information can be best shared between different organisations	DfT is now a member of the Disability Action Alliance set up by the ODI, which brings together disabled people's organisations with organisations from the public, voluntary and private sectors, to work in partnership to deliver actions at a national and local level that make a real difference to the lives of disabled people.		
	Its monthly newsletter includes a 'Good News Stories to Share' page where Alliance members can learn from and be		

Department for Transport		
26. Regular disability equality training should be provided for frontline staff on handling disability-related harassment and clear guidance to staff on routes to take when reporting an incident. This should be included as part of core training, before transport staff work with the public		
Commitment	Update	
26.1 The DfT will seek to ensure that existing disability awareness training provided by transport operators includes modules on disability- related harassment, and involving relevant stakeholders	See update in section 6.1.	
26.2 The DfT are exploring with the Traffic Commissioner the development of a Code of Practice for bus operators aimed at reducing harassment on the bus network	See update in section 6.2.	
27. Disabled people should be involved in public transport policy development and transport providers should work in partnership with criminal justice agencies to reduce risk on and around transport provision		
Commitment	Update	
27.1 The DfT will explore the options for successor arrangements for obtaining advice from stakeholders should it be decided that Disabled Passengers Transport Advisory Committee is abolished	Following the Government's announcement on 12 June 2013, to retain the Disabled Persons Transport Advisory Committee, DfT is currently reviewing the Committee's role and membership.	
27.2 The DfT will also explore the scope for disseminating amongst local authorities good practice on setting up and running local access groups, to ensure that disabled people and disabled people's organisations are consistently involved in the development of transport policy	Through ODI's Disability Action Alliance, the DfT are looking to work with its transport project team to promote messages and awareness to transport operators and local authorities around good practice examples of engaging with disabled people and their organisations to improve accessibility in their local areas.	
28. Data on high risk areas and subsequent actions to reduce risk should be collated. Based on this data they should provide adequate protection where known high risks exist, in the same way as other provision is made, for example, around football matches		
Commitment	Update	
28.1 The DfT will explore with transport operators, transport authorities and the police the practicalities of collating information on high risk areas, and how the risks in these areas can be reduced.	Work in this area is ongoing and we will be reporting further in the Accessibility Action Plan progress report in December 2013.	

Cabinet Office 25 Great Smith Street London SW1P 3BQ

Publication date: November 2013

© Crown copyright 2013

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence.

To view this licence, visit www.nationalarchives.gov. uk/doc/open-government-licence/ or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or e-mail: psi@nationalarchives.gsi.gov.uk. This publication is available for download at www.gov.uk

ISBN: 978-1-78246-261-3