

## Equality Impact Assessment

The Equality Impact Assessment Guidance **must** be used when completing this form:

[http://intranet.aware.mps/Corporate/Policy/Territorial\\_Policing/SOP/Equality\\_Impact\\_Assessment\\_SOPs.htm](http://intranet.aware.mps/Corporate/Policy/Territorial_Policing/SOP/Equality_Impact_Assessment_SOPs.htm)

### Freedom of Information Act Document

**Protective Marking:** Not Protectively Marked

**Publication (Y/N):** Y

**Title:** Haringey Borough Stop and Search Equality Impact Assessment

**Summary:** This document examines the impact of the stop and search/account tactic on members of the diverse communities of Haringey in order to avoid differential, discriminatory and adverse impact and to promote equality of opportunity and positive relations.

**Branch / OCU:** Haringey Borough

**Date created:** 17.05.2010

**Review date:** 17.05.2013

**Version:** 1

**Author:** Inspector Jackie Savage (01YR)

### Directorate/Department/Borough/OCU:

**Name, type or title of proposal** (If a corporate policy, a policy workbook must also be completed):

Stop and Search/Account Equality Impact Assessment for Haringey Borough

### 1. Aims and Purpose of Proposal - see Step 1 of the Guidance

The aim of this proposal is to ensure that officers comply with the law, acting within their powers under the Police and Criminal Evidence Act, the Criminal Justice and Public Order Act 1991 and the Terrorism Act 2000 and that all Stop & Account and Search powers are used fairly, responsibly, without unlawful discrimination and with respect for people being searched; encounters should be carried out as part of intelligence led policing and in a manner that is supported by the community.

The purpose of this proposal is to set out the operating procedures enshrined in the MPS Stop and Search/Account Standard Operating procedures to achieve clarity on how the powers should be used, supervised and managed in a fair and proportionate manner in order to gain or retain the trust and confidence of the communities who live and work in Haringey.

### 2. Examination of Available Information – see Step 2 of the Guidance.

- All Haringey stops are entered onto the CRIMINT Plus database from which enquiries can be made; the stops reporting tool provides a flexible search facility for enquiries and results;
- The MPS stops monitoring mechanism produces headline data and rolling thirteen month figures for stop and search/account in both commentary/documentary and graph formats;
- Existing mechanisms facilitate the legitimate provision of information on stop and search/account to members of the community direct from the Borough;
- An independent local monitoring group for stop and search operates within Metropolitan Police Authority guidelines; this discusses all aspects of the use of the stop and search/account tactic and feeds the MPA Stop and Search Community Monitoring Network (SS CMN) Forum.

### 3. Consultation/Involvement - see Step 3 of the Guidance

<p>a. Who is responsible for managing this consultation/involvement? Chief Inspector (Professional Standards Unit)</p>
<p>b. Why is this consultation/involvement taking place? Consultation is necessary to provide information and reassurance to the community and to build trust and confidence in Haringey Police</p>
<p>c. Who is included within the consultation/involvement, including which group(s)? Consider beneficiaries, stakeholders, service users or providers and those who may be affected.</p> <ul style="list-style-type: none"> <li>• Haringey Race Equality Council;</li> <li>• Independent Monitoring Group;</li> <li>• Community Police Consultative Group;</li> <li>• Ward panels;</li> <li>• London Borough of Haringey Safer Communities Unit;</li> <li>• Schools and youth projects.</li> </ul>
<p>d. What methods of consultation/involvement are employed to ensure full information sharing and participation, e.g. surveys, interviews, community meetings?</p> <ul style="list-style-type: none"> <li>• Independent Monitoring Group;</li> <li>• Community Police Consultative Group;</li> <li>• Meetings with borough community scrutiny groups;</li> <li>• Neighbourhood Policing surveys, meetings and workshops;</li> <li>• Schools and youth engagement projects;</li> <li>• Public complaints about stop and search/account activity made through the Haringey Professional Standards Unit.</li> </ul>
<p>e. What are the results of the consultation/involvement? How are these fed back into the process? Local data indicates</p> <p>Results are fed back via the Independent Monitoring Group and Community Police Consultative Group mechanisms and more locally through neighbourhoods. Where training issues are identified through any of these and other mechanisms, they have been incorporated into borough training.</p> <p>In January 2010, as a result of local quality processes surrounding S44 stops, a significant number of deficiencies were identified in the stops input and administration processes. These have been addressed through officer input (rather than central input) with the intention of improving timeliness and accessibility to stops information.</p>

**4. Screening Process for relevance to Diversity or Equality issues** - see Step 4 of the Guidance

<p>(i) Will the proposal have significantly higher impact on a particular group, community or person the MPS serves or employs? Explain: The borough ethnic profile is based on residential population from the 2001 Census - the measure by which the Home Office gauges disproportionality in stop and search/account. This does not incorporate the significant levels of the transient population that visit Haringey to work, study or use shopping, leisure and entertainment facilities and transport links - the 'street population'.</p>
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Haringey communities are supportive of the use of stop and search/account tactics by police on the basis that they are intelligence-led and deployed with tact and sensitivity.

Stop and search/account Information indicates that proportionately higher numbers of young males and young black males are subjected to stop and search/account tactics; the borough is mindful of sensitivities associated with such outputs and ensures that the tactic is intelligence focused and based on offender/suspect/accused profiles for priority crimes and prolific priority offenders. In respect of stops under S60 Criminal Justice and Public Order Act, these will be based upon evidence of areas where knife crime activity is high and particularly within the auspices of Operation Blunt 2.

(ii) Will any part of the proposal be directly or indirectly discriminatory?

Explain: Although MPS stop and search/account operating procedures are not discriminatory *per se* the outputs indicate that young black men are disproportionately searched under all stop/search powers; it may, however, be an indicator. This needs to be balanced against suspect, accused and offender profiles, the prevalent 'street population' and the requirement to use focused intelligence to target suspects or offenders.

The perception of discrimination by some parts of the Haringey community is valid given existing levels of disproportionality; the borough is careful to ensure that the tactic is reinforced by intelligence and legitimate factors such as the variance between census data and the actual 'street population'. Where appropriate a robust, accountable and personal explanation is offered to the appropriate individual or body by an individual on the borough with the appropriate status, such as a member of the senior management team in a Community Police Consultative Group meeting.

(iii) Is the proposal likely to negatively affect equality of opportunity?

Explain: Appropriate use of the stop and search/account tactic is fundamental to the development and preservation of positive relations between the police and the communities of Haringey. The information gained during a stop and search/account encounter is used both for intelligence purposes and to provide the information for local and force management information.

(iv) Is the proposal likely to adversely affect relations between any particular groups or between the MPS and those groups?

Explain: The fact that young black males may perceive that they are targeted unfairly is a significant risk to any positive elements that exist in the relationship between this group and the police. This in turn is likely to negatively impact the relationship between police and other groups within the community that have minimal or no contact with the police because of the limited opportunities to rebut this perception.

This factor alone makes the implementation of a community communication and engagement strategy a key factor in the development and preservation of positive Haringey community relations with police.

(v) Are there any other community concerns, opportunities or risks to communities arising from the proposal?

Explain: There is an opportunity to better engage and form closer links with the communities of Haringey and build trust and confidence through improved understanding of police use of the stop and search/account tactic.

(vi) Is the proposal likely to harm positive attitudes towards others and discourage their participation in public life?

Explain: The continued perception of unfair treatment towards young black men through the disproportionate use of stop and search/account tactics risks damage to the trust and confidence of both this community and others in Haringey, both in the immediate and longer-term. Experience in dealing with the many communities in Haringey (the levels of diversity in the borough have risen considerably over the last five years) have shown that such relationships take many years to foster and nurture, are sensitive and easily damaged; losing this trust and confidence denies access to the benefits that such diversity adds to both policing and the livelihood of Haringey borough.

(vii) Is the proposal a major one in terms of scale or significance?

Explain: Haringey Police uses the full range of legislation in order to make the borough as safe as it can be. The risks to certain groups and the potential damage to these and others have already been articulated.

In terms of scale the proposal is significant; the use of stop and search powers under the Terrorism Act 2000 has the potential to impact every community in Haringey in addition to the community as a whole as a result of activity to respond to the threats from international and domestic terrorism. The use of S60 Criminal Justice and Public Order Act 1991 is underpinned by the need for the borough to respond to the threat of serious violence or the carriage of weapons; in addition the deployment of Operation Blunt 2 by the Metropolitan Police regularly focuses increased levels of search activity on Haringey Borough.

From the answers supplied, you must decide if the proposal impacts upon diversity or equality issues. If yes, a full impact assessment is required. If no, complete the following box and enter a review date at the end of the form.

<b>Full Impact Assessment Required</b>	Yes <i>(delete as applicable)</i>
<b>Signed: Inspector Jackie Savage</b>	<b>Date: 6th April 2010</b>
<b>Supervised: Chief Inspector Graham Dean</b>	<b>Date: 6th April 2010</b>

#### 5. Full Impact Assessment – see Step 5 of the Guidance

a) Explain the likely differential impact (whether intended or unintended, positive or negative) of the proposal on individual service users or citizens on account of:

Age: older people, children and young people.

Details: Searches by age group on Haringey Borough indicate that a majority of stop and search/account encounters are within an age profile of 18 to 25 years but often only marginally greater in number than those between the ages of 26 to 45 years. The use of S60 powers through Operation Blunt 2 also results in a disproportionate increase in the numbers of young people stopped and searched. The perception by young black males of disproportionately unfair treatment can be addressed through the dissemination of appropriate information through effective engagement both on an individual and informal level through the policing of neighbourhoods and on a more formal basis, community forums, schools projects and the Independent Monitoring and Community Police Consultative Groups.

Disability in line with the Social Model.

Details: No data is held specifically in relation to disabled people and there is no local forum dedicated to the representation of this group. Any differential impact to disabled people through the use of the stop and search/account tactic will be monitored through the community consultative process and through the borough's existing strong links with local and national

	disability support groups.
	Faith, religion or belief: those with a recognised belief system or no belief.
	Details: Data is not collected about an individual's faith and the Home Office has determined through consultation that most people would be unwilling to disclose their faith during the stop and search/account encounter. Through the use of powers under the Terrorism Act 2000, the perception from young Muslim men is one of disproportionality in the use of stop and search. It is only through sensitive engagement through community forums that these perceptions can be addressed.
	Gender or marital status: women and men.
	Details: Data is not collected on marital status but is collected on gender and shows that considerably more males than females are stopped by police; this is broadly in line with suspect/accused/offender profiling and has not caused any community issues.
	Race, ethnicity, colour, nationality or national origins.
	Details: A disproportionate number of black males are stopped and searched/asked to account for their actions on Haringey Borough due to the suspect/accused/offender profiling. The perception of this group is often one of unfair targeting; in fact the levels of disproportionality for this group are among the lowest for this geographical area of London and lower than the average for the whole of the Metropolitan Police Service. Notwithstanding, the risks of erosion in trust and confidence still exist.
	Sexual orientation, transgender or transsexual issues.
	Details: No specific data is held in respect of lesbian, gay, bisexual and transgender communities although there is anecdotal evidence to suggest some perception of disproportionality in the use of stop and search/account tactics. Analysis has shown that such activity is intelligence led or as a result of public complaints. Notwithstanding, the risks of an erosion in trust and confidence still exist.
	Other issues, e.g. public transportation users, homeless people, asylum seekers, the economically disadvantaged, or other community groups not covered above.
	Details: There is no evidence to suggest that other community groups are negatively impacted through the use of the stop and search/account tactic in Haringey. This would be brought to notice through discussions with the Independent Monitoring Group and the Community Police Consultative Group.
b)	Is the proposal directly or indirectly discriminatory? Is there a genuine occupational requirement?
	Details: This proposal is indirectly discriminatory as suspect/accused/offender profiling and the composition of the 'street population' leads to a disproportionately higher number of black males being stopped and searched/asked to account for their actions. Suspect/accused/offender profiling and the deployment of Operation Blunt 2 on the borough will also raise issues of disproportionality. Stop and search/account activity on Haringey Borough is scrutinised by the Independent Monitoring Group and the Community Police Consultative Group.
c)	Explain how the proposal is intended to increase equality of opportunity by permitting positive action.
	Details: The proposal is not intended either to increase or decrease equality of opportunity.

d)	Explain how the proposal is likely to promote good relations between different groups.
	Details: Haringey Borough intends to improve the understanding of its communities about the stop and search/account tactic through effective engagement and communication.
e)	Explain how the proposal is likely to promote positive attitudes towards others and encourage their participation in public life.
	Details: The Community Police Consultative Group and other less formal forums bring together the diverse elements of Haringey's communities in order to discuss, disseminate, inform and educate them about issues relating to stop and search/account.
f)	Explain how the proposal enables decisions and practices to adequately reflect the service users perspective.
	<p>Details: The operating procedures relating to stop and search/account are unequivocal in respect of the expectations of MPS staff using these tactics and the consequences of failure to do so. In such clarity lies the opportunity to deliver the tactic in an informed way and make a positive impact on the customer and potentially their community.</p> <p>As a key tactic in the operational officer's menu of options the use of stop and search is delivered as part of basic training and reinforced following arrival on the borough.</p> <p>The Independent Monitoring Group and the Community Police Consultative Group both afford a voice to the various elements of the community and the opportunity to impact the use of the stop and search/account tactic.</p>

## 6. Modifications – see Step 6 of the Guidance

Could the proposal be modified to reduce or eliminate any identified negative impacts, or create or increase positive impacts? What improvements have been made?

- Clarity in MPS operating procedures on stop and search/account with regard to the conduct of officers using the tactic and their responsibility to comply with various elements of diversity legislation;
- The use of local formal and informal monitoring groups as a vehicle for a two-way dialogue on issues relating to stop and search/account and an opportunity to reinforce the benefits of a tactic that is properly used to protect the community;
- Ensuring activity that might be considered disproportionate is evidence and/or intelligence led;
- The appointment of a single point of contact for stop and search/account on each borough;
- Effective local supervision of stop and search/stop and account interactions and administration;
- The scrutiny of S44 data drove a change locally from central input to officer input to improve ownership, accuracy in details on the relevant database and timeliness (and therefore access to the information in the event of an issue raised internally or a public complaint);
- Publication of stop and search/account information on a monthly basis on the MPS intranet and appropriate sharing thereof facilitates openness and a healthy dialogue between the police and the community.

## 7. Further Research - see Step 7 of the Guidance

Given the analysis so far, what additional research or consultation is required to investigate the impacts of the proposal on the diversity strands?

Regular scrutiny of stop and search/account data to ensure that no adverse trends are developing; where this is the case the borough needs to ensure that changes are either evidence or intelligence

driven and be in a position to share this with the Haringey community through both formal and informal channels;

## 8. Decision-making - see Step 8 of the Guidance

a.	Name, rank or grade of decision maker Chief Inspector Graham Dean
b.	What is the Decision? Reject the proposal No Introduce the proposal Yes Amend the proposal (an impact assessment should be made of any amendments) Yes
c.	Name, rank or grade of SMT/(B)OCU/Management Board endorsing decision Superintendent Chris Barclay

## 9. Monitoring - see Step 9 of the Guidance

a.	How will the implementation of the proposal be monitored and by whom? <ul style="list-style-type: none"><li>• Regular scrutiny of stop and search/account information by the Haringey Borough Professional Standards Unit both as a quality mechanism and as a result of public complaints;</li><li>• Scrutiny of stop and search/account tactics and information through formal and informal community forums;</li><li>• A corporate process that consists of a dialogue on stop and search/account issues between the borough commander and a territorial policing commander.</li></ul>
b.	How will the results of monitoring be used to develop this proposal and its practices? The Chief Inspector Professional Standards Unit has oversight of issues relating to stop and search/account and can either direct action or training or disseminate this information to the appropriate portfolio lead through the senior management meeting structure.
c.	What is the timetable for monitoring, with dates? <ul style="list-style-type: none"><li>• Corporate information on stop and search/account is provided and scrutinised on a monthly basis;</li><li>• Issues raised on an 'ad hoc' basis by the appropriate police commander are actioned locally with timescales and feedback;</li><li>• Independent Monitoring Group meetings, Community Police Consultative Group meetings and Haringey Race Equality Council meetings are held according to a published schedule and minutes are taken.</li></ul>

## 10. Public Availability of Report/Results - see Step 10 of the Guidance

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

This document will be published corporately, both on the MPS internet site (Haringey page) and on the Haringey Borough intranet site.

<b>Person completing EIA:</b> <b>Signed: Inspector Jackie Savage</b>	<b>Date: 7th April 2010</b>
<b>Person supervising EIA:</b> <b>Signed: Chief Inspector Graham Dean</b>	<b>Date: 8th April 2010</b>
<b>Quality Assurance Approval:</b> <b>Name and Unit: Chief Inspector Graham Dean</b>	<b>Date: 9th April 2010</b>
<b>Date Review Due:</b>	<b>1st May 2013</b>