

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

Freedom of Information Act Document

Protective Marking: Not protectively Marked

Publication (Y/N):

Title: Equalities Impact Assessment of stop and Search, Lewisham Borough

Summary:

Branch / OCU: PL

Date created: 05.03.2010

Review date: 05.03.2013

Version: 1

Author: CI Graham PRICE

Directorate/Department/Borough/OCU:

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

This document examines the impact of stop and search/account on the diverse communities, which live on Lewisham Borough. It ensures that all will be treated fairly according to their needs in the application of this activity. It seeks to limit adverse impact and promotes equality of opportunity and good community relations within the Borough and beyond.

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

AIM: To ensure that the powers of stop and search/account are exercised fairly by police in respect of the people who live work and pass through Lewisham.

PURPOSE: To continue on-going engagement with communities and their appointed or recognised representatives to gain fresh insights and views of the experience of stop and search on the Borough of Lewisham. To ensure that relevant on-going consultation is made that improves relationships with groups that perceive themselves as being disproportionately affected by the use of stop and search/account powers on the borough. To revise and update the existing stop search/account E.I.A produced on the 15th February 2007.

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

Lewisham as a whole has good levels of community engagement in all aspects of policing. This holds true for stop search/account. The Lewisham Community Police Consultative Group (LCPCG) has a formed, mature and developed stop search/account scrutiny group with meetings five times a year. The group is empowered to ask for what they feel they need and the police are able to provide. They receive both the MPA figures and a restricted document from local performance review unit to inform their deliberations, this local information containing data concerning Section 60 authorisations and Section 44 TACT searches. This is discussed with senior decision makers within the Borough Police.

The key issues for the group is an apparent over-representation of young black men within the stop search/account figures and the preponderance of searches for drugs over any other form of criminal activity.

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

a. **Who is responsible for managing this consultation/involvement?**

Chief Inspector Partnership and Safer Neighbourhoods Teams; Inspector Partnership; SNT sergeants;

b. **Why is this consultation/involvement taking place?**

To make an assessment of the impact of police activities on local communities.

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.**

Consultation is widely made and includes statutory partners, the chairs and groups of the LCPCG and Advisory Group, Ward Panels; Safer Neighbourhoods teams; Youth advising police (YAP) group; student bodies at local senior schools and youth ward panels; also practitioner level staff within the police via the internal stop search/account monitoring group.

d. **What methods of consultation/involvement are employed to ensure full information sharing and participation, e.g. surveys, interviews, community meetings?**

Consultation is an on-going and developing process within Lewisham. The key meetings are the LCPCG stop search/account-monitoring group, MPA Community Monitoring Network meetings, and the internal stop search/account working party. The first group is set up under Reg 61 and includes community representatives from across the borough. At present there are five meetings a year. At the chair's independent insistence, this meeting is now varied in time, with some being scheduled for evenings to allow wider youth representation and for those whose work does not allow them to attend a daytime meeting.

Regular meetings of the Lewisham Police Advisory Group frequently consider the issue of stop and search, and it is an issue frequently debated by the YAP group. Both of these groups are represented on GOLD groups and to briefings for preplanned events where the use of the tactic may be anticipated.

Schools and Youth engagement officers give an input on stop search/account at appropriate levels during the school careers of Lewisham children and young people, often in support of the PSHE syllabus. Police are part of the ENOUGH! Coalition that is set up to reduce knife offences and violence on Borough. SNT and Schools officers are tasked by the partnership portfolio to seek the views of their Ward Panels and Student bodies respectively. The latter are accessed via consultation with the student councils and other internal representatives.

e. **What are the results of the consultation/involvement? How are these fed back into the process?**

The results show a wider support for the tactic within the younger community, generally, than among their elders. In the main, numerically few individuals are affected by stop search/account activity; there is plenty of anecdote, which is retold and tends to crop up regularly. Pupils at the local Pupil Referral Unit are perhaps naturally least inclined to support the police use of their powers, others youth groups and individuals are more nuanced. It would be fair to say that generally they are supportive of police use of the tactic to suppress knife carrying *in principle*. In practice there is still widespread unease and a feeling of dissatisfaction with the quality of the encounter. Many young people feel police are unnecessarily aggressive towards them when carrying out stop and search. Much of this is based on tales about a 'friend of a friend' who has been searched, but enough direct anecdote is available, and consistent in content, to be entirely discounted. This is not unique to this Borough. Some older people, conversely, are likely to be more critical of police tactics, although this is often based on a

residual feeling of frustration or resentment in relation to incidents which occurred twenty plus years ago. In general, it is fair to say that the community is broadly supportive, with a sizeable minority uneasy about the behaviour of some officers when carrying out the action.

To address these concerns, the borough is negotiating with Second Wave Youth arts in Deptford, a community based group which has worked with the borough police and Territorial support Group (TSG) extensively in the past, to deliver some professional development with police to improve the experience of stop and search for people on the borough.

The results are fed back to the internal working group, with the representatives given a chance to take that back to their co-workers, but also to give input to the lay members present. The feedback is also more formally provided in the form of minutes of meetings, community tension reports, BLUNT returns and bespoke community engagement reports.

A suggestion has been made to the chair of the LCPCG that they might consider putting in place a system whereby people who have had either a good or bad experience of stop and search or account can notify them as a third party and that this information can be fed back to the borough police through a single point of contact such as Chief Inspector partnerships. In some cases, if formal action is needed, the body might act as a 'third party' to make complaints or feed back actions to the community. This discussion is on-going.

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

(i) **Will the proposal have significantly higher impact on a particular group, community or person the MPS serves or employs?**

Explain: MPS and local data, which is compared to the demographic profile derived from 2001 census data, indicates that stop search/account tactics disproportionately affect young black men on the Borough. This is replicated across the MPS. In Lewisham's case, there is a debate to be had on

- a) The actual accuracy of the 2001 census data which statisticians argue about
- b) Whether the comparison should actually be made against school census data

If the latter, the disproportionality would be much less than using the 2001 data set. The data is less disproportionate when set against the actual descriptions of suspects as provided by victims and witnesses of street crime, or the make-up of street based organised networks, (gangs). The conflicting issue in using this data is that in fact the bulk of recorded stop and search activity is actually to interdict the use or supply of drugs.

Stop and search internally affects uniform PCs or officers on proactive units such as PCTT over any other section of staff. This makes them increasingly vulnerable to complaints.

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

Explain:

The activity will disproportionately affect young black males.

As outlined above, the issue as to whether this is fair or not is fiercely debated and subject to extensive research, debate and supervision.

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

Explain: Additional police activity around stop and search and the collation of data to judge police actions informs police intelligence and internal police management activities. The publication of the raw data, without informed comment around it, and with no true consensus or academic rigour to evaluate the statistical data, may lead to nervousness within communities that they will be treated less fairly in all areas where they come into contact with the police and Criminal Justice System.

Police activity is largely intelligence driven according to the profile of suspects as provided to the police by victims, or other witnesses. Much of the serious youth violence will be driven by gang activity, and similarly, the profiles of gangs on the borough will be reflected in the demographics of stop search activity.

- (iv) **Is the proposal likely to adversely affect relations between any particular groups or between the MPS and those groups?**
Explain: Young black males are apparently disproportionately affected by stop search activity, and this leads to a perception that they are being treated less fairly.
- (v) **Are there any other community concerns, opportunities or risks to communities arising from the proposal?**
Explain: The use of stop search/account is mostly recognised by those involved in the consultations performed as a valuable tool to deal with certain types of crime. This is also recognised by young people, who largely recognise the benefits of removing knives and other weapons from the streets of Lewisham. The disquiet largely centres around the actions of individual officers and their attitudes towards the subjects of their actions.
- (vi) **Is the proposal likely to harm positive attitudes towards others and discourage their participation in public life?**
Explain: Given that increasingly, the community have experienced police only in an enforcement role, it is possible that negative impressions of the police gained whilst young will stay with individuals as they grow older, unless they are able to counter these impressions with some positive encounters with police.
- (vii) **Is the proposal a major one in terms of scale or significance?**
Explain: Police activity on stop search/account is led by the National intelligence Model. This identifies which crimes are targeted and identifies geographical hotspots and victim and suspect profiles. Police activity is informed by this data. Few policing activities have as much capacity on a daily basis to impact on relations with the community in a positive or negative fashion. In the past, stop search/account operations have led to widespread and serious public disorder, which needs to be set against any short term or limited impact on crime achieved.

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.

Full Impact Assessment Required	Yes <i>(delete as applicable)</i>
Signed:	Date: 05.03.2010
Supervised:	Date:

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: Young people are particularly likely to be stopped and searched as they are more likely to be encountered upon the streets.
Disability in line with the Social Model.

	<p>Details: No differential impact identified</p>
	<p>Faith, religion or belief: those with a recognised belief system or no belief.</p>
	<p>Details: Insufficient data to judge, but anecdotally, people of Muslim or perceived to be of Muslim backgrounds are more likely to be affected by Section 44 stop search/account.</p>
	<p>Gender or marital status: women and men.</p>
	<p>Details: Males are more likely to be affected than female.</p>
	<p>Race, ethnicity, colour, nationality or national origins, e.g. people of different ethnic background including minorities.</p>
	<p>Details: Black people are more likely to be stopped and searched, and people of asian appearance most likely to be stopped and searched under S44</p>
	<p>Sexual orientation, transgender or transsexual issues.</p>
	<p>Details: Whilst there is no identified issue on Lewisham Borough, it is recognised that some members of the LGBT community may fear being misunderstood by the police, which can impact on encounters</p>
	<p>Other issues, e.g. public transportation users, homeless people, asylum seekers, the economically disadvantaged, or other community groups not covered above.</p>
	<p>Details: Stop and search/account has not been raised as a particular concern with the Travellers liaison officer or in forums run by police or partners.</p>
b)	<p>Is the proposal directly or indirectly discriminatory? Is there a genuine occupational requirement?</p>
	<p>Details: The activity disproportionately affects young black males, and whilst the reasons for this are up for debate, some measures such as enhanced community training on stop and search can impact on the sense of injustice some might feel. Police activity is largely intelligence based and profiles exist to explain why these groups are targeted.</p>
c)	<p>Explain how the proposal is intended to increase equality of opportunity by permitting positive action.</p>
	<p>Details: MPS Standard Operating procedures seek to minimise negative impact. Local borough arrangements seek to improve equality and fairness, and also explain disproportionality where it exists.</p>
d)	<p>Explain how the proposal is likely to promote good relations between different groups.</p>
	<p>Details: By an honest appraisal of the data and a calm consideration of its implications, the police and community may arrive at a better understanding of the facts which enables a two way conversation with the community that will inform and assist them to advise police to act in the best possible way.</p>
e)	<p>Explain how the proposal is likely to promote positive attitudes towards others and encourage their participation in public life.</p>

Details:

Police consultation, if carried out in good faith and not simply as a 'tick box' activity, can serve as a vehicle for the community to have its say, and the good relationships so engendered may be carried over into other areas where police seek partnership.

- f) **Explain how the proposal enables decisions and practices to adequately reflect the service users perspective.**

Details:

As above

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?

STOP & SEARCH and RECOMMENDATION 61 SCRUTINY GROUP

This meets five times a year and scrutinises data relating to police stop search/account activity on the borough. Senior managers from Lewisham regularly attend these meetings.

LEWISHAM POLICE STOP SEARCH WORKING PARTY

This internal body, which has lay reps from the above group, mirrors the meeting schedule of the LCPCG group and ensures that the issues are dealt with, and stimulates debate within the service locally about the implications of stop search/account actions.

LOCAL CONSULTATION/INFORMATION LISTS

Representatives of the local community are informed as soon as possible after the implementation of any Section 60 on the Borough. An e-mail circulation list is provided for out of hour's notification; SMT members will contact and discuss the issues with partners and their reps during office hours. Any S60 is accompanied by a community impact assessment by the instigating officer to assess its effectiveness and any potential community feedback.

LOCAL COMMUNITY INPUT TO POLICE TRAINING SCHEDULES

Lewisham Police are working with trusted partners to develop bespoke community assistance for officers on Borough to improve the quality of interaction when carrying out stop and search.

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?

Further research needs to be carried out to investigate the apparent disproportionality of stop and search activity on young black males.

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

a. Name, rank or grade of decision maker

b. **What is the Decision?**

Reject the proposal

No *(delete as applicable)*

Introduce the proposal

Yes *(delete as applicable)*

Amend the proposal (an impact assessment should be made of any amendments)

Yes *(delete as applicable)*

c. **Name, rank or grade of SMT/(B)OCU/Management Board endorsing decision**
Chief Inspector Graham PRICE, Partnership, Lewisham

9. Monitoring - see Step 9 of the Guidance

a. **How will the implementation of the proposal be monitored and by whom?**
Via the Rec 61 Scrutiny Committee and working party

b. **How will the results of monitoring be used to develop this proposal and its practices?**
By scrutiny of data, a process of continuous engagement with the community, stop search/account champion and leads; monitoring of complaints and effective supervision by managers

c. **What is the timetable for monitoring, with dates?**
See published dates of LCPCG meetings.

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

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

The MPA figures are readily available.

Borough Comms will establish an effective media strategy to give out good news stories and spread the MPS message.

Information will be placed on the Borough website.

SNT Newsletters may be used to put out information of local initiatives

Person completing EIA:	
Signed: Graham PRICE CI Partnership	Date: 05.03.2010
Person supervising EIA:	
Signed:	Date:
Quality Assurance Approval:	
Name and Unit: Insp Peter AMOS PRU PL	Date: 10.03.2010
Date Review Due: 05.03.2013	