

EQUALITY IMPACT ASSESSMENT (updated January 2022)

Follow the Equality Impact Assessment (EIA) policy when completing this form.

Need some help? If you are unsure of any of the questions, click the 'GUIDANCE' button which provides key information about each step.

You can also view the CPIE Inclusion Unit intranet pages for additional advice and guidance.

FOIA INFORMATION					GUIDANCE	
Protective Marking	Official	Publication Scheme	Yes			
Title	Operation Boxster					
Branch / OCU	North Area					
Date Created	15.02.2022	Review Date		Version	1	
Author	[Name redacted] Police Sergeant					

STAFF INFORMATION					GUIDANCE	
Person Completing EIA	[Name redacted] Police Sergeant					
Signed		Date				
Person Supervising EIA/SLT Approval						
Signed		Date				
Quality Assurance Approval						
Name		Unit		Date		

DECISION MAKING			GUIDANCE	
Reject the proposal / policy	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		
Implement the proposal / policy	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		
Produce an alternate proposal / policy (if so, a new EIA must be completed)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		
If this EIA is a successor to a previous EIA as a result of an alternative proposal, state the date of the original EIA	Date	NA		
SLT OCU / BCU / Management Board endorsing decision				
Name		Rank / Grade		

Please note: The information on this page is retained, it is not published.

EQUALITY IMPACT ASSESSMENT

STEPS 1 TO 8

STEP 1. Aims and purpose of the proposal / policy

GUIDANCE

1. A complete review of Borough policies in relation to dealing with the problem of street prostitution to ensure that the operation is fully compliant with National College of Policing guidelines and to ensure that identified vulnerable people are fully safeguarded.
2. All interactions with sex workers will be reviewed to ensure that the interactions have purpose and support a Safeguarding purpose.
3. To examine the relationship between Police and Outreach teams working with sex workers.

STEP 2. Screening process for relevance to diversity and equality issues

GUIDANCE

Each “protected characteristic” in Section 5 has guidance as to what implications / issues you may need to consider.

Does this proposal / policy have any relevance to:		Internal, relevant to staff / or working practices	External, relevant to service delivery	Not relevant to either
A	Age	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
B	Deaf and disabled / Disability	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
C	Gender Reassignment	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
D	Marriage and Civil Partnership (employment only)	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
E	Pregnancy and Maternity	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
F	Race	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
G	Religion or Belief	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
H	Sex	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
I	Sexual Orientation	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
J	Other Issues	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

STEP 3. If you have ticked yes to any protected characteristic box in Step 3, a full impact assessment is required.

GUIDANCE

Full assessment required? (If Yes, a full EIA is required.)

Yes

No

STEP 4. Examination of available information

GUIDANCE

STEP 5. Full Impact Assessment Process

STEP 5a. Consultation Log

GUIDANCE

Consultation activities held must be specific and proportionate. These could include the MPS Staff Support Associations and networks, Federation and Unions (MET-TUS), Independent Advisory Groups & Diversity Forums and other Public Sector Organisations and/or Government Departments.

Where are the consultation records stored? (These should be either in Box or One Drive alongside this EIA, to meet GDPR retention requirements).

Name of Business Group / Unit, Association, Stakeholder (External)	Why are you approaching them?	Date and method of planned consultation	Outcome of consultation

STEP 5b. EIA Action Plan

From your consultation activities and available information explain within the appropriate Action Plan template the potential positive and / or negative impact of the proposal / policy, internally on members of your workforce and externally on your communities / service delivery:

Age	GUIDANCE	Race	GUIDANCE
Deaf and disabled / Disability	GUIDANCE	Religion and Belief / No Belief	GUIDANCE
Gender Reassignment	GUIDANCE	Sex	GUIDANCE
Marriage and Civil Partnership (employment only)	GUIDANCE	Sexual Orientation	GUIDANCE
Pregnancy and Maternity	GUIDANCE	Other Issues	GUIDANCE

STEP 5c. Action Plan Template Workforce Impacts (Internal)

GUIDANCE

Potential positive / negative issues / impacts	Activity	Role Holder	Action By Date	Progress/Timescale/ Monitoring

STEP 5d. EIA Action Plan Template Service Delivery Impacts (External)

Potential positive / negative issues / impacts	Activity	Role Holder	Action By Date	Progress/Timescale/ Monitoring

STEP 6. Ensure monitoring and review arrangements are put in place**GUIDANCE**

How will the implementation of the proposal / policy be monitored and by whom?

In June 2020 a three day review process took place to look at the impact and effectiveness of Operation Boxster. As a result of this review a new approach was adopted and as part of the review the impact on street sex workers was looked at the tactics altered.

A review of 'Operation Boxster' tackling 'Sex Workers and Perpetrators' current delivery and proposals.

Executive summary: The purpose of this paper is to share findings following a scoping exercise that took place with members of the Operation Boxster Team, NPT partner wards, Salvation Army, Streetlights, London Borough of Enfield/Haringey and the NHS. A review was commissioned by Insp [Name redacted] to assess current working practises around the reduction and safeguarding of sex workers and community confidence in line with Met direction, NPCC and CPS guidelines.

The current process identified gaps in what is a revolving door style of Policing approach to tackling both Sex workers and Perpetrators' focusing solely on enforcement which may have been why we have seen a recent trends in 'sex workers' moving into Haringey spreading the issue instead of dealing with the cause and applying a problem solving approach to developing tactics and policies.

Trends identified.

1. A lack of a coordinated partnership approach to safeguarding sex-workers.
2. A gap in gathering of intelligence around the causes and issues of sex workers
3. A lack of joint up approach with our outreach worker teams, business communities and communities
4. A lack of joint up approach internally with ward officers.
5. A lack of ward updates to DWO's to help inform ward panels; community members of Op Boxster resulting in low in confidence in communities

Objective and aims

Objective: To apply problem solving approaches we will aim to seek and embed cost effective staffing systems and install processes to attempt to change the behaviours of sex workers to lessen community complaints and strive to reduce underlying reasons why sex workers find the area to be so attractive.

Aims:

To build an accurate picture through a mapping process working with Met Intel and the central Modern Slavery Team of existing practises and processes used to reduce sex-workers to create a safer environment for communities that live and work in NA.

To ensure that effective delivery is taking place with meaningful long term solutions moving away from revolving door approaches to Policing in terms of arrests and criminalisation of sex workers; instead applying a problem solving approach by embedding clear and concise systems (IOM and/or Gangs Matrix) to manage escalating behaviours, community impact and environmental degradation to the local community alongside introducing diversionary practices working with NA service VAWAG service providers.

To adopt a partnership approach balancing enforcement, intelligence and engagement around police contact with sex workers improving the lives of 'sex workers' and communities.

To improve community confidence by introducing a joint communication strategy between partners (internal and external) to create better engagement with ward panel via ward DWOS to inform partners of the work that Operation Boxster conducts sharing an awareness and understanding of the limitations of legislation, enforcement operations and effects of adopting national guidance on police activity.

1. Source; an overview of the Data collation.

Project data was compiled from the following sources:

- Historic work returns for operations targeting sex workers on Enfield Borough.
- Work trackers from the multiple different tactics deployed in the area.
- Anecdotal complaints and recurring community concerns highlighted to affected wards.

2. Findings

The review evidenced that the current set up was not in line with NPCC and CPS practices that are very much based on actively encouraging safe-guarding approaches to sex workers. The framework set out under NPCC guidance (see link below) needs to be point by point examined and woven into the existing Operation Boxster set-up.

The current practice of multiple arrests are not cost effective and also do not contribute to the reduction or safeguarding of sex-workers. Each enforcement or arrest through to case disposal cost an average of £600 and 25 hours staffing time. After the first arrest where officers obtain biometrics from the individual court fines or outcomes range from time served in custody to £80 court fine. This revolving arrest of subjects is neither cost effective in staffing time nor cost to the MPS.

Historic enforcement led operations are no longer supported in courts and although well received by the community do not impact on numbers of sex workers or change their behaviours. There is a need to work innovatively to apply a problem solving approach and safeguard women not criminalise.

A more evidence /complaint based approach is required to get court support for prosecutions and possible banning notices which needs to show that all avenues of diversion / warning and enforcement have been tried before resorting to community banning notices or orders.

The previous approach of “zero tolerance” put police tactics at odds with outreach programmes and in many cases caused our partners considerable difficulties by removing or criminalising sex workers without prior knowledge of the police work.

Data around police activities is centred on enforcement tactics such as street cautions or arrests. This data can be used by police to show police time and resources spent on reducing sex workers but cannot show any real reductions or long term planning to tackle the problem. A figure based approach by police hinders long term problem solving and means that officers are more reactive to political / council pressures rather than community complaints.

In addition the new Met Direction stipulates a framework which closely links in with the work on Operation Boxster. The three operational pillars are laid out as:

- Focusing on what matters most to Londoners,
(This links with a complaint based approach from the community.)
- Mobilising our partners and our communities and,
(Working closely with outreach organisations to change the behaviours of sex workers committing ASB behaviour.)
- Achieving the best outcomes in the pursuit of justice and in support of victims.
(Exploring different tactics and methods to achieve best evidence.)

Delivering on these priorities, the operation needs to focus on:

- Seizing the opportunities of data and digital tech to become a world leader in policing
- Caring for each other, working as a team, and be an attractive place to work
- Learning from experience, from others, and constantly strive to improve
- Be recognised as a responsible, exemplary and ethical unit and become subject matter experts.

Analysis; limitations of the Data

There has always been a great difficulty in accurately recording the volume of sex workers in the area. Street cautions give an indication of the numbers of sex workers but does not track impact of police activity when dealing with sex workers and kerb

crawlers.

This lack of data has left it open to interpretation on whether any reductions have been made and the success or failure of engagement or proactive operations.

The nature of street prostitution makes it a very visible problem to the community. The visibility of sex workers, day in day out, leads to apathy towards the police and the lack of understanding around custodial limitations on prostitution offences has led a decline in the confidence in the police in the main wards affected by street prostitution.

Further analysis can be found in Appendix 1

Recommendations.

Operation Boxster are seeking direction to innovate and drive change through a variation of projects to address respective outcome areas via a range of intervention types themed as follows.

- A. Complaint led proactive policing – prioritising behaviours which directly affect the community – drug use – sex litter – aggressive behaviour towards businesses working with DWO’s
- B. The adoption of an IOM style grading of “problem” sex workers which notifies outreach workers and NA VAWAG service providers of the individuals and areas that are being targeted by police so that interventions and engagements are directed to assist with dealing with sex worker complaints.
- C. Intelligence gathering and joint working with the Modern Slavery Unit (MPS) (which focuses on organised crime trafficking) to identify and target exploiters of sex workers.
- D. Daily tracking of sex workers seen by the unit to accurately record the rise/fall of sex workers and to provide actionable data when viewed with policing operations or engagements.
- E. Capture good practice both nationally and internationally.
- F. The adoption of partnership approach and monthly reviews of problem sex workers with our stake-holders will allow for targeting interventions. The current process relies on one way information from police to stake-holders, which protects the client confidentiality which has sometimes hindered positive outcomes.
- G. The instigation on a monthly stakeholders meeting with outreach workers identifying sex workers whose behaviour has impacted the community and generated complaints.
- H. The adoption of case workers from Op Boxster to collate information, evidence and statements to support any escalation in targeted enforcement.
- I. Tracking of sex worker numbers to ensure accurate data is obtained and watch for displacement due to operations.
- J. Targeted enforcement rather than zero tolerance style policing to support safe guarding and to ensure compliance with national models on police actions when dealing with sex workers.

3. Benefits

The benefits of this review has enabled us to have a better oversight of what police actions have become redundant or not cost effective and how we can improve trends by embedding a structure and processes to measure trends and success to fall in line with NPCC, CPS guidelines and Met Direction.

The unit can focus on targeted enforcement using complainant’s information, backed by proper intelligence gathering to deploy the team’s activities.

The acceptance and mind-set of officers and communities through awareness of multiple arrests tactics is not being time effective can now result in greater visible police presence spent more time patrolling increasing community presence by decreasing significant time spent in lengthy custody procedures to no avail due to NPCC and CPS guidelines allowing for more regular dialogue with prominent residents and businesses.

The processes will plug the gaps in accountability from our partners and allow us to progress through the criminal justice system by

showing the attempts at interventions / diversions versus the need to protect the community and the need to maintain public confidence.

4. Equality Assessment -

This approach means that all police activity is closely monitored taking in to consideration all of the identified protected characteristics covered by EIA. Female sex workers are now viewed as vulnerable persons who require safeguarding and their complicated history's taken into consideration with outreach strategies put in place.

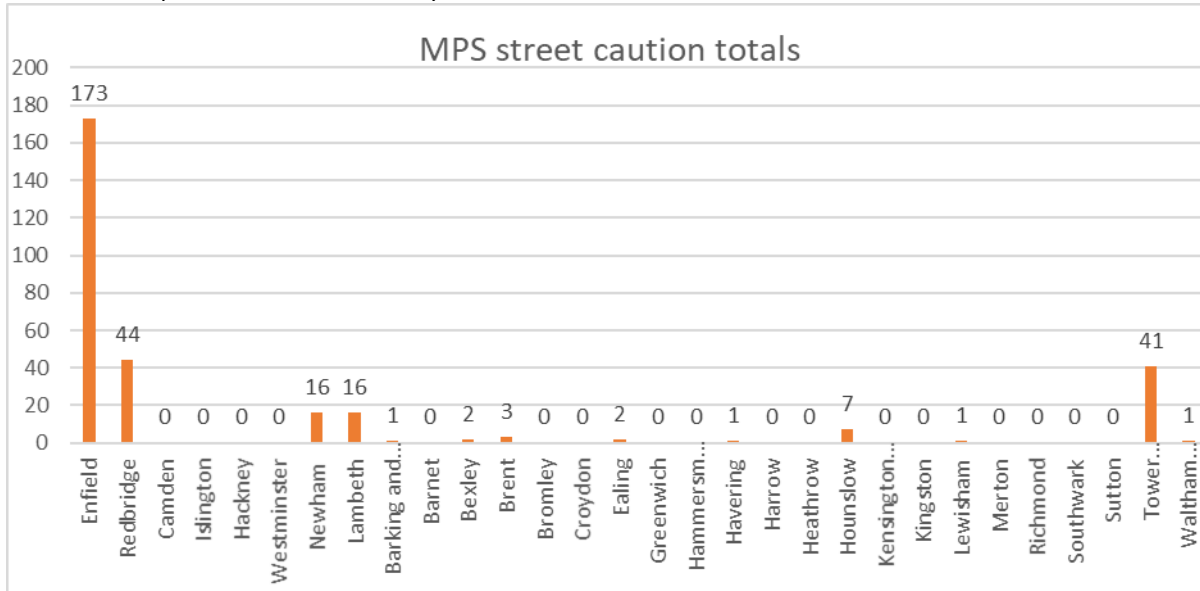
Appendices 1 – Data of Enforcement 01.01.2018-17.10.2018

Chart 1 – Data of Enforcement activity conducted on Enfield

Total number of Police Cautions	173	01.01.18	17.10.18
Total Number of individual sex workers	89	01.01.18	17.10.18
Total number of foreign nationals	82	01.01.18	17.10.18
Total number of British sex workers	7	01.01.18	17.10.18
Total number of arrests of sex workers	30	01.01.18	17.10.18
Total number of arrests kerb crawlers	50	01.01.18	17.10.18

Source: data abstracted from Merlin Systems

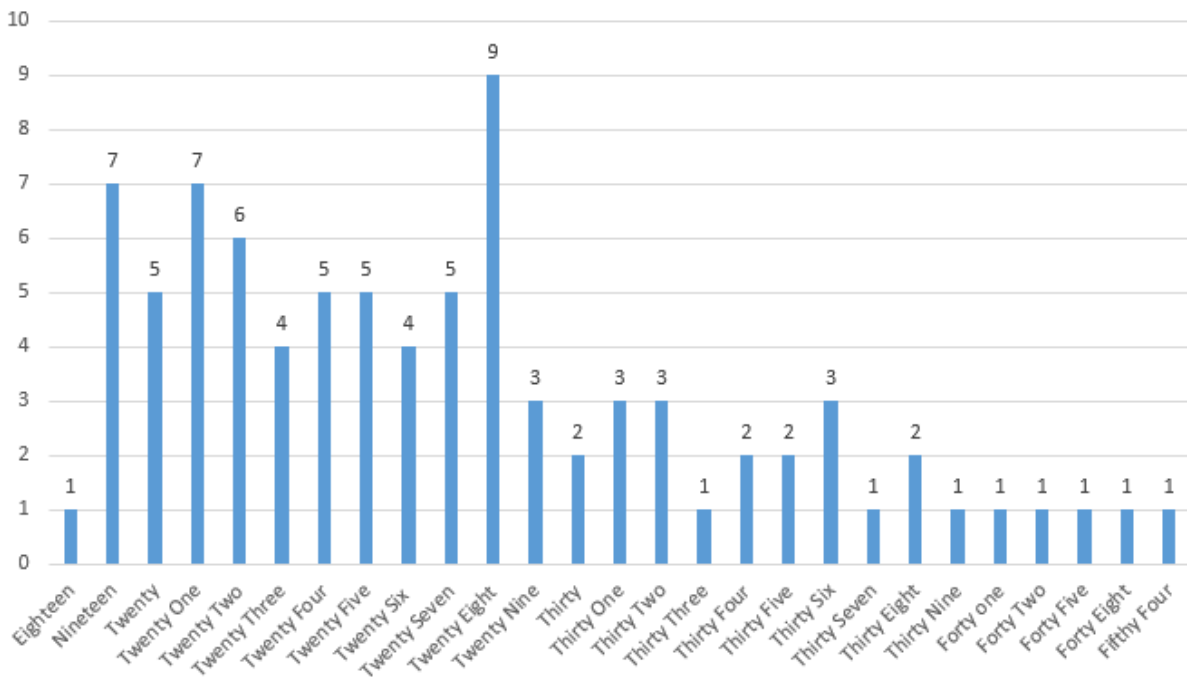
Chart 2 – Comparison of caution activity across MPS between 01.01.2018 -17.10.2018



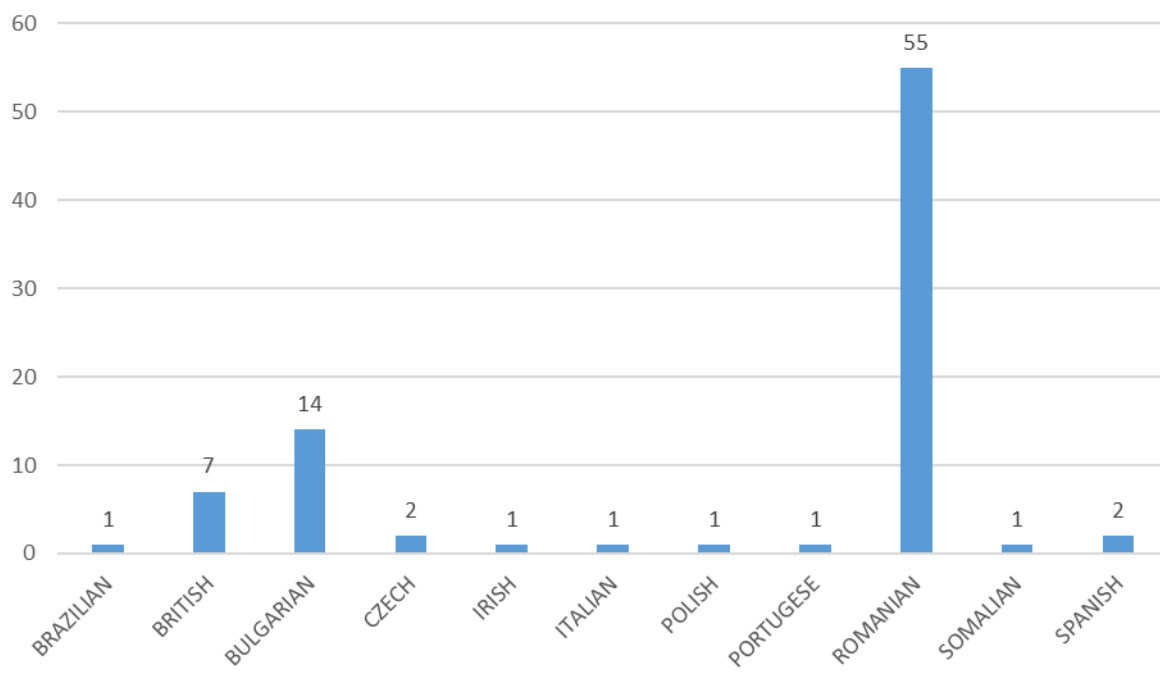
Source: Merlin prostitute data across MPS –

Table 1 – Breakdown of ages and nationalities of Sex Workers.

Age of Sex Workers



Count of Nationality Of Sex workers



Source: Merlin data

Appendices 2 – National College of Policing – Guidance of Policing of Sex workers

<https://library.college.police.uk/docs/appref/Sex-Work-and-Prostitution-Guidance-Jan-2019.pdf>

This document was produced in 2019 and has been circulated nationally as the blueprint to be adopted by Police Services for a consistent risk based approach to dealing with prostitution.

The five underlying principles are listed as:

1. "The sex industry is complex, often stigmatised, and has many evolving typologies. It is often hidden from the wider public. We recognise this environment is conducive to the abuse or exploitation of those selling sex."
2. "Policing starts from a position that seeks to address vulnerability and exploitation. We will engage with those involved in order to

build mutual trust and confidence and encourage the sharing of information to improve safety.”

3. “The police should use engagement and intelligence to develop a better understanding of the typologies and extent of prostitution. We will work with partners to develop an approach that tackles the issues associated with sex work and prostitution by engaging a wide group of stakeholders.”

4. “The role of policing is not to make moral judgements. The police focus will be on reducing vulnerability and criminality. We will seek to maximise safety and increase trust and confidence. This will encourage those in the sex industry to report crimes and abuse. This approach will shift the focus onto safeguarding those being harmed in the sex industry. Intelligence and information should be shared between forces and relevant partners to maximise safety and target those who exploit or cause harm.”

5. “An evidence-based ‘what works’ approach will be used to enhance awareness of officers and partners dealing with this complex environment. It will ensure the focus is on vulnerability and safety and a consistent approach across the country.”

All Public Authorities such as the Metropolitan Police Service (MPS) have to comply with section 149 of the Equality Act 2010 more commonly known as the General Duty.

The Duty requires us to:

- **Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act.**
- **Advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it.**
- **Foster good relations between people who share a relevant protected characteristic and those who do not share it.**

One of the ways we can demonstrate that we are complying with the General Duty is to document how decisions are reached and resulting activities including monitoring and review arrangements. In the MPS, the way we evidence this is by completing EIAs.

What is the timetable for monitoring, with dates?

The monitoring of the operation are done on a weekly basis with sightings and worksheets completed by officers. This work sheet includes a breakdown of sex workers age, drug dependency, nationality, kerb crawler details and sightings sheets.

The data is reviewed monthly by an Inspector rank on monthly performance meetings chaired by SLT. The dates for this vary. It is then further reviewed by SLT every six months with the last date being 10th February 2022. The next scheduled review will be set for August 2022.

STEP 7. Public availability of reports / result. What are the arrangements of publishing, where and by whom?

GUIDANCE

Reports are completed for the operation and are part of the Enfield Crime Scrutiny Panel due to be held March 2022 – presented by Supt [Name redacted] Six weekly updates are provided to Supt [Name redacted] for briefing of key partners. The nature of the data held on sex workers is confidential and is not to be disclosed.

Please see below for the checklist.

STEP 8: SUPERVISION / QUALITY ASSURANCE CHECKLIST (Completed by Line Manager)				
<i>I have read the MPS EIA Policy and understand my obligations under the Public Sector Equality Duty (Sec 149 Equality Act 2010) prior to completing Quality Assurance?</i>		<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<i>Has the Lead Responsible Officer (LRO) clearly outlined the policy / project design/ business change proposal / operational decisions aims, objectives and strategy, providing sufficient information to effectively assess equality impact?</i>		<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<i>Has the LRO taken proportionate and necessary steps to collate and evaluate sufficient available qualitative and quantitative demographic diversity data to identify impacted individuals/groups, including consultation?</i>		<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<i>Where relevant information is not readily available, has the /LRO demonstrated due regard to obtaining it by; a) Collecting new sources of data itself and/or b) Commissioning research and/or c) Direct engagement with affected individuals/groups and/or d) Collating external information sources?</i>		<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<i>Has the LRO conducted effective proportionate and necessary consultation activities with internal/external stakeholders and subject matter experts to identify impacted individuals/groups?</i>		<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<i>Has the /LRO listed all equality impact identified via their collation and evaluation of data/information and/or consultation activities?</i>		<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<i>Has the LRO effectively demonstrated taking proportionate and necessary steps to eliminate and/or reduce all identified negative equality impact?</i>		<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<i>If negative impact has been identified which cannot be eliminated or reduced, has the LRO mitigated the impact by providing an objective justification supported through an evidenced-based Legitimate Aim?</i>		<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<i>Has the LRO clearly outlined their Monitoring and Review Strategy demonstrating how future equality impact will be 'collated, evaluated, identified and mitigated'?</i>		<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Line Managers Recommendations:				
Supervisor Name Rank/Band:		Date Completed:		

STEP 8B: SENIOR RESPONSIBLE OFFICER (SRO) DECISION MAKING		
<i>SRO's are required to endorse policies and practices within the MPS. If an SRO rejects a proposal based on an EIA's findings, they are required to record their recommendations. Rejected proposals require new EIA completion and further SRO endorsement (in which case state the date of the original EIA for audit purposes).</i>		
Reject the Policy / Proposal	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Implement the Policy / Proposal	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Produce an alternate Policy / Proposal (if so, a new EIA must be completed)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If this EIA is a successor to a previous EIA as a result of an alternative proposal, state the date of the original EIA	Date	
SRO Recommendations:		
SRO Name Rank/Grade:		Date Completed: