



**METROPOLITAN
POLICE**

TOTAL POLICING

Freedom of Information Act Publication Scheme	
Protective Marking	Not Protectively Marked
Publication Scheme Y/N	Yes
Title	Female Genital Mutilation (FGM) Policy – Equality Impact Assessment
Version	1.0
Summary	Female Genital Mutilation (FGM) Policy – EIA
(B)OCU or Unit, Directorate	Sexual Offences, Exploitation & Child Abuse
Author	
Review Date	March 2021
Date Issued	1 January 2017



EQUALITY IMPACT ASSESSMENT

The Equality Impact Assessment (EIA) Standard Operating Procedure (SOP) must be used when completing this form. Click the link below to view the EIA SOP.

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 contact your Diversity and Citizen Focus Directorate (DCFD) Advisor for guidance and support.

FOIA INFORMATION						GUIDANCE
Protective Marking	Not Protectively Marked	Publication Scheme		Yes		
Title	Female Genital Mutilation (FGM) Policy					
Branch / OCU	SC&O17					
Date Created	20/01/2017	Review Date	31/03/2021	Version	1	
Author	DC Cendrine Manceau-Ward					

EQUALITY IMPACT ASSESSMENT

STEPS 1 TO 7

STEP 1. Aims and purpose of the proposal / policy	GUIDANCE
The purpose of the policy is to provide a review of existing Metropolitan Police Service (MPS) policy and standard operating procedures (SOP) on investigating FGM in order to produce an updated policy for implementation across the MPS. The policy will provide guidance and minimum standards for the response, recording and investigation of FGM offences and ensure that it incorporates guidance and recommendations from: Working Together To Safeguard Children London Safeguarding Children Board (LSCB) College of Policing Home Office Her Majesty's Inspectorate of Constabulary (HMIC) Crown Prosecution Service and considers and incorporates ongoing recommendations and changes across the MPS infrastructure. It shall ensure that the following overarching consideration is adhered to: 'The Voice of the Child' Officers and staff should observe, listen to and be alert to the needs of the child and record throughout the investigation, the views of that child, the impact of the issues in the case and keep them appropriately informed throughout.	

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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	☐ Yes	☒ Yes	☐ No
B	Deaf and disabled / Disability	☐ Yes	☒ Yes	☐ No
C	Gender Reassignment	☐ Yes	☒ Yes	☐ No
D	Marriage and Civil Partnership (employment only)	☐ Yes	☐ Yes	☒ No
E	Pregnancy and Maternity	☐ Yes	☒ Yes	☐ No
F	Race	☐ Yes	☒ Yes	☐ No
G	Religion or Belief	☐ Yes	☒ Yes	☐ No
H	Sex	☐ Yes	☒ Yes	☐ No
I	Sexual Orientation	☐ Yes	☒ Yes	☐ No
J	Other Issues	☐ Yes	☒ Yes	☐ 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
Existing Policy on FGM investigations London Child Protection Procedures 2016 College of Policing Guidance Existing Metropolitan Police Training Packages	

If there is anything you are unsure of in this first section you can visit the Diversity and Citizen Focus Directorate (DCFD) intranet site for further information and advice, or contact one of the DCFD Diversity and Citizen Focus Advisors by clicking below.

STEP 5. Full Impact Assessment Process

STEP 5a. Consultation Log			GUIDANCE
Where are the consultation records stored? (e.g. General Registry, S-Drives etc)			
Continuous Improvement Team Shared Drive.			
Name of Business Group / Unit, Association, Stakeholder (External)	Why are you approaching / not approaching them?	Date and method of planned consultation	Outcome of consultation
Directorate of Legal Services (DLS)	Guidance on material contained in the toolkit.	23/11/2016: Final draft consultation.	Clarification sought around wording in Q&A. Positive feedback
HQ Performance & Risk	Guidance on material contained in the toolkit.	23/11/2016: Final draft consultation.	Positive feedback
HQ Human Resources	Guidance on material contained in the toolkit.	23/11/2016: Final draft consultation.	No feedback
HQ Finance	Guidance on material contained in the toolkit.	23/11/2016: Final draft consultation.	No feedback
Police Fedration	Guidance on material contained in the toolkit.	23/11/2016: Final draft consultation.	No feedback.
MPS TUS Secretariat	Guidance on material contained in the toolkit.	23/11/2016: Final draft consultation.	No feedback
Safety & Health Risk Management (SHRM) Management Board (MB) and Metropolitan Police Authority (MPA) Reports	Guidance on material contained in the toolkit.	23/11/2016: Final draft consultation.	No feedback
Inspector (FGM Subject Matter Expert)	Guidance on material contained in the toolkit.	14/11/2016: Final draft consultation.	Positive feedback

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 or 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)				GUIDANCE
Potential positive / negative issues / impacts	Activity	Role Holder	Action By Date	Progress/Timescale/ Monitoring
Age All children are entitled to receive a service according to their needs. This policy refers to the safeguarding of all children, including unborn children, up to the age of 18 years as legislated by the Children Act 1989 and 2004. All children are considered vulnerable to emotional, physical and sexual abuse or subject to neglect by another person until they reach adulthood. Offences are governed by legislation which considers differing ages for differing offences. FGM is most often performed on girls between infancy and age 15. It can, however, be carried out on women and girls of all ages, including newborns. There will be a positive continuing impact of the policy.	Implementation of the policy on FGM	Detective Superintendent, Sexual Offences Exploitation and Child Abuse (SOECA)		Ongoing
Disability All children are entitled to receive a service according to their needs. Children with disabilities may be more vulnerable to risk of abuse due to the varying degree of dependency on another for levels of care depending on the type and level of disability. Advice and guidance should be sought from Children's Social Care regarding any child who has a recognised or perceived disability.	Implementation of the policy on FGM	Detective Superintendent, SOECA		Ongoing

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CPS (Crown Prosecution Service) and Achieving Best Evidence Guidance provides a framework to mitigate any disadvantage that a child with disability potentially could face. There will be a positive continuing impact of the policy.				
Gender Reassignment All children are entitled to receive a service according to their needs. Transgender children may be more at risk of abuse where their gender identity conflicts with cultural, religious, faith or personal interpretations of traditional gender roles. Joint agency working and training highlights the need to provide services to these children and to be aware of the varying issues faced by transgender children. There will be a positive continuing impact of the policy.	Implementation of the policy on FGM	Detective Superintendent, SOECA		Ongoing
Gender All children are entitled to receive a service according to their needs. All allegations against children are investigated regardless of gender (London Child Protection Procedures 2016). FGM is by the nature of the offence performed on females and female children born to women who have undergone FGM and other female children in the extended family must be assessed appropriately for risk. There is cultural pressure on females in	Implementation of the policy on FGM	Detective Superintendent, SOECA		Ongoing

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communities practicing FGM to enforce the procedure. There will be a positive continuing impact of the policy.				
Pregnancy & Maternity All children are entitled to receive a level of service according to their needs. Unborn children are protected by law. FGM can be carried out on women and girls of all ages, including newborns, and adult women in association with marriage or re-infibulation following childbirth. Females who have undergone FGM procedures may be likely to experience difficulty and complication during childbirth. There will be a positive continuing impact of the policy.	Implementation of the policy on FGM	Detective Superintendent, SOECA		Ongoing
Race All children are entitled to receive a level of service according to their needs. Perceptions and misunderstandings of cultural practices are not a barrier to the full investigation of allegations of FGM. Necessary support services and complainant requests must be considered where there is some availability to obtain police services of different race, ethnicity, nationality or natural origins to whom the complainant can communicate to more effectively. FGM is most prevalent in the western, eastern and north-eastern regions of Africa	Implementation of the policy on FGM	Detective Superintendent, SOECA		Ongoing

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and in some parts of Asia and the Middle East. Increased migration, however, means that FGM-practising communities can be found worldwide, including Europe, North and South America and Australasia. There will be a positive continuing impact of the policy.				
Religion and Belief All children are entitled to receive a level of service according to their needs. Some communities in the UK may choose to continue the practice of FGM as a way of maintaining their traditional identity. It may also be done to counteract concerns that girls are becoming too westernised and is sometimes used as a threat to curb behaviour. FGM practices are underpinned by beliefs regarding the position of women and girls within certain cultures. Religious and cultural belief are not a barrier to the full investigation of allegations of FGM. There will be a positive continuing impact of the policy.	Implementation of the policy on FGM	Detective Superintendent, SOECA		Ongoing
Sexual Orientation All children are entitled to receive a level of service according to their needs. There may be specific issues relating to the abuse of LGBT children which can be compounded in faith and/or cultural issues. Joint agency working and training highlights these issues and complainants must be dealt with on a case by case basis. There will be a positive continuing impact of the policy.	Implementation of the policy on FGM	Detective Superintendent, SOECA		Ongoing

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Other Issues All children are entitled to receive a level of service according to their needs. Children who are seeking asylum, homeless or in the United Kingdom illegally are entitled to the same level of service and protection offered by the law. This toolkit does not discriminate against those who are at a social or economic disadvantage. There will be a positive continuing impact of the policy.	Implementation of the policy on FGM	Detective Superintendent, SOECA		Ongoing

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?	
The policy will be monitored by Sexual Offences Exploitation and Child Abuse (SOECA) Continuous Improvement Team (CIT) to ensure it is current and correct. This will be done by the ongoing partnership of SOECA Senior Leadership team (SLT), Mayor's Office for Policing & Crime (MOPAC), partner agencies and SOECA CIT to identify emerging trends, best practice and monitor compliance, reviewing and updating the policies as and when required.	
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?	
4 years from publication with continual monitoring.	

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