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25/09/2018

**FREEDOM OF INFORMATION REQUEST REFERENCE NUMBER: 158/18**

Thank you for your request for information regarding National Policing Sex Work Guidance which has now been considered.

**Applicant Question:**

Please can you provide the following information relating to the National Policing Sex Work Guidance dated 2015, with its third review specified as December 2017:

What steps were taken to comply with the Public Sector Equality Duty (PSED) when originally developing the guidance?

Please provide full records, including impact assessments of all steps taken.

What steps were taken to comply with the PSED when reviewing the guidance?

Please provide full records, including impact assessments of all steps taken during each review.

What steps were taken to ensure the guidance complies with binding obligations under Article 6 of the Convention on the Elimination of All Forms of Discrimination against women (CEDAW)?

What steps were taken to ensure the guidance complies with binding obligations under protocol to prevent and punish Trafficking in persons especially women and children, supplementing the United Nations convention against transnational organised crime?

**NPCC Response:**

Following the dissolution of the Association of Police Chief Officers (ACPO), designation under the Freedom of Information Act did not automatically transfer across to the National Police Chiefs' Council (NPCC). The NPCC, as the new coordinating body, should clearly be open to the same level of scrutiny and transparency as its predecessor and it is anticipated that an Order to bring the NPCC under the auspices of FOIA will be forthcoming. This is currently the responsibility of the Cabinet Office and the NPCC is supporting the Cabinet Office in bringing forward the Order.

In the meantime, the NPCC will comply with the spirit of the Freedom of Information Act and will respond to all requests received as if it were still subject to FOIA. Applicants should note, however, that until the formal designation is in place and the legislation is amended to include the NPCC, the



Internal Review process will remain in place but there is no legal basis to pursue complaints to the Information Commissioner's Office.

The NPCC would have responded in the following way:

The NPCC does not hold information captured by your request. There are no records held by the NPCC Portfolio that answer the questions posed. This is because the current holders of the portfolio took over in late 2017. You will note from the published National Policing Sex Work Guidance (provided below for convenience) was authored by ACC Nikki Holland. ACC Holland no longer represents the NPCC or works for a police force.

<http://library.college.police.uk/docs/NPCC/National-Policing-Sex-Work-Guidance%20-%202015.doc>

In wishing to assist you, I have consulted with colleague who confirm that the latest iteration of the guidance is currently being finalised and will include an Equality Impact Assessment. This will further go to the NPCC Council for final ratification in early 2019. It should however be noted that this is 'guidance' and each Chief Officer is responsible for their own force.

Yours sincerely

Sherry Traquair  
Freedom of Information Officer & Decision Maker

[www.npcc.police.uk](http://www.npcc.police.uk)

## **COMPLAINT RIGHTS**

### Internal Review

If you are dissatisfied with the response you have been provided with, in compliance with the Freedom of Information legislation, you can lodge a complaint with NPCC to have the decision reviewed within 20 working days of the date of this response. The handling of your request will be looked at by someone independent of the original decision, and a fresh response provided.

It would be helpful, if requesting a review, for you to articulate in detail the reasons you are not satisfied with this reply.

If you would like to request a review, please write or send an email to NPCC Freedom of Information, c/o PO Box 481, Fareham, Hampshire, PO14 9FS.

If, after lodging a complaint with NPCC, you are still unhappy with the outcome, you may make an application to the Information Commissioner at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.