



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	VAWG 100					
Branch / OCU	Public Protection					
Date Created	23/10/24	Review Date	22/10/25	Version	2.0	
Author	Redacted					

STAFF INFORMATION						GUIDANCE
Person Completing EIA		Redacted				
Signed		Date				
Person Supervising EIA/SLT Approval		Redacted				
Signed		Date				
Quality Assurance Approval		Equality Impact Assessment Manager				
Name	Redacted	Unit		Date		

DECISION MAKING			GUIDANCE
Reject the proposal / policy	☐ Yes	☐ No	
Implement the proposal / policy	☐ Yes	☐ No	
Produce an alternate proposal / policy (if so, a new EIA must be completed)	☐ Yes	☐ 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		
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

The VAWG 100 is part of Commissioner Mark Rowley's vision to tackle the most harmful perpetrators of violence against women and girls (VAWG) in London in a data led fashion.

The project aims to identify the most harmful perpetrators, on a monthly basis, by considering offences that meet the NPCC definition of VAWG. By searching Connect and CRIS data, we identify all the relevant crimes in the preceding 365 day period where a particular individual is named as suspect in either Connect or CRIS.

Each crime is then assigned a score according to the Cambridge Crime Harm Index, which is the starting point for the recommended term of imprisonment, as decided by the Sentencing Council sentencing guidelines, converted into a number of days. For each offender, all the individual scores are summed to provide an overall score, which is then used to rank all the c. 35,000 VAWG offenders in London.

This VAWG 100 proposal is in line with Pillar 2 of the National VAWG strategy namely; Relentless perpetrator pursuit. It aims to introduce a new way to prioritise our MPS resources by being more proactive in ensuring we focus on the most dangerous offenders that are known to be violent to women and girls. The launch of this new methodology is ensuring that we prioritise activity by implementing a new offender process, where we task action against these known violent perpetrators.

The process is achieved by a new suspect stacking and tasking (SST) list and its purpose is an additional tool for combatting violence against women and girls. This list will be achieved by identifying the most dangerous suspects that are harming women and girls by stacking them all. There are approximately 35,000 known offenders who will be staked in rank order with the known most violent offender as number 1. This list will be completed on a monthly basis, and having it will increase our knowledge of them and have a process to track our efforts to stop these 100 most dangerous causing high harm.

The aspiration is to have consistency of narrative across the MPS of how we manage the high harm offenders and to ensure that our staff have a clear understanding of this new process.

The reason for this change is the MPS is moving to a more evidence based decision making process to help manage demand. The Top 100 VAWG suspects are thousands of times more dangerous than the vast majority of the 35,000 suspects named in a year's VAWG offence reports, yet many of them may evade intervention because their extreme danger is not recognized in context.

By having a rank ordered list it helps the Met ensure that they have considered all legal and effective interventions on as many of the 100 most harmful VAWG suspects in London over the past 365 days as possible.

This EQIA is intended to assess potential equality impacts against members of the public – aiming both to identify disadvantages suffered by any individual and/or group safeguarded by a protected characteristics, and also by those who are not (such as socio-economic groups).

Where disproportionate impacts are identified, the aim is to mitigate any identified disadvantage by eliminating the impact, reducing the impact or, where necessary, accepting the impact. If elimination and/or reduction is not possible the MPS are required to implement a positive action strategy or provide a justification rationale for not doing so under the criterion of Proportionality, Legality, Accountability and Necessity (P.L.A.N). This has been captured within the MPS Legal Mandate.

The purpose of conducting EIAs is to meet the legal requirements set out in the Public Sector Equality Duty (PSED), and, specifically, in relation to the three aims and three specific duties under section 149 of the Equality Act 2010 (the Act).

The Three Aims

In summary, those subject to the PSED must, in exercising their functions, have due regard to the need to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
2. Advance equality of opportunity between people who share a protected characteristic and those who do not.
3. Foster good relations between people who share a protected characteristic and those who do not.

The Three Specific Duties

The Act explains that having due regard for advancing equality involves:

1. Removing or minimising disadvantages suffered by people due to their protected characteristics.
2. Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
3. Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

This EQIA aims to demonstrate the MPS's commitment to demonstrating 'due regard' and 'real consideration' and meeting the PSED's three aims and three specific duties. Specifically, this EQIA examines potentially disproportionate effects on particular groups that could be generated by targeted the most harmful perpetrators of VAWG in London, together with potential mitigations

Some of the key operational benefits of the VAWG 100 project are:

- It allows police to prioritise scarce resources in the areas where they will have greatest impact.
- It is data driven and minimises the amount of human judgement and bias in the selection of offenders (noting that we are using data that is biased / disproportional to inform the selection).
- It provides support for the officers in the case such as the identification of key tactics that they could use to bring the perpetrator to justice, or to disrupt them, prior to allocating the case to them.

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 2, 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

This is a new proposal of targeting offenders. The aim of this proposal is to create a prioritized list of offenders (aged over 18) who are most likely to commit serious violent and sex crimes against women and children, and will be used for preventive police operations.

The Home Office term 'violence against women and girls' (VAWG) refers to acts of violence or abuse that we know **disproportionately** affect women and girls. Crimes and behaviour covered by this term include rape and other sexual offences, domestic abuse, stalking, 'honour'-based abuse (including female genital mutilation forced marriage, and 'honour' killings), as well as many others, including offences committed online.

Crime types within VAWG include:

- All domestic abuse offences
- Child Sexual Exploitation and Abuse
- Honour based; Forced marriage; FGM
- Non domestic homicide; Rape; Other sexual offences; Violence with injury
- Non domestic exploitation of prostitution; stalking and harassment; modern slavery.

The data selection for this new proposal will long term be obtained from a range of alternative intelligence sources capable of feeding into the design of this system. This will include internal and national Police databases such as, The MPS Crime Reporting Information System (CRIS), the Police National Computer (PNC) data base which amount other information contains conviction data set, PND, PINS, ACRO as the information they provide all have the potential to add value to this task of identifying violence.

The initial design will use mainly the CRIS data to carry out data extraction. This data will provide access to all reported crimes during a pre-defined time range (365 days) and pre-set offence parameters.

The Victim demographic:

Victims must be females aged ten or more.

Suspect demographic:

The initial testing looked at all suspects; male or female of any age. This has been modified to focus on those over the age of 18. Initial dataset found that Around 10% of the suspects stacked were female. This is in line with general Domestic Abuse (DA) offending. Since initial testing, this has been developed to only scan for male offenders. This initial decision was made by the Commissioner.

The second stage of this proposal is what we do with the data. This essentially comes down to offender management. The list of 100 offenders will contain names of people who are free, in addition to those in HMP. Some will be suspected of an offence on CRIS, some will be shown as being wanted on warrant and some will have no actionable intelligence i.e. not currently arrestable or for development.

It will be for BCUs and other specialist units to take action against those identified. The process by which this happens is not yet finalised, but it could be tasked via the daily Pace Setter Meetings. I believe there is a potential need for a central intelligence unit to task any action out, but this unit does not currently exist.

There may be opportunities for proactive development around individuals. This could be where they appear on the list and police are in possession of current intelligence that could be worked on. This may not necessarily be for violent offences but could be for any offence such as drugs or weapons; an Achilles heel type approach in order to put potentially violent offenders before the courts.

This project is about the stacking of dangerous offenders in order to best target those who pose the greatest risk to women, children and, indeed, the general public. It is not about compiling an arbitrary list of offenders or suspected offenders where no or little action would be taken. There will be strict governance, with performance measured and results scrutinised.

This EIA is in development and we hope to engage with the key stakeholders and the public to ensure we get this right.

There is a second and separate project in place, which is along the same lines but using academic research and algorithms to better predict offending. This will take some time to develop. This first element of the project is to ensure some positive action is being taken in the interim, to better protect the people of London as soon as possible.

Legal Framework

The use of ANPR by law enforcement requires due regard to the legal framework covering privacy and equality

Below is a list of the more pertinent pieces of general legislation and specific guidance and policy issued by the Home Office in relation to the use of ANPR for the purposes of law enforcement.

Section 149 of the Equality Act 2010 (the Act) – Public Sector Equality Duty (PSED)

<http://www.legislation.gov.uk/ukpga/2010/15/contents>

Section 149 of the Act sets out legal obligations for Public Sector Organisations known as the Public Sector Equality Duty. This legislation set out 3 Aims and 3 Specific Duties:

The 3 Aims

In summary, those subject to the PSED must, in exercising their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

The 3 Specific Duties

The Act explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics.
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

Meeting the Equality Duty in Policy and Decision Making

<https://www.equalityhumanrights.com/en/advice-and-guidance/public-sector-equality-duty>

<https://www.equalityhumanrights.com/en/publication-download/technical-guidance-public-sector-equality-duty-england>

Key Points:

- Impacted groups to consider include Internal Staff and External Service Users.
- The impact of protected characteristics individuals or groups within the above two categories.
- The analysis of diversity data/protected characteristics information on staff and service users affected the proposal.
- Requirement to make 'evidence-based' decisions.
- Data gathered must be quantitative and qualitative, based on current, accurate data sources.
- If data is unavailable the relevant body must demonstrate due regard in order to obtain it.

The Technical Guidance lists key Discriminatory Exceptions:

The basic presumption under the Act is that discrimination because of a protected characteristic is unlawful. However, the act recognises that not all people can be treated the same, and people with different protected characteristics can be treated differently to reflect their particular needs. The Act recognises that compliance with the duty may involve treating some people more favourably than others.

The Act achieves this in three main ways:

- By requiring people with some protected characteristics to be treated differently (e.g. making reasonable adjustments for disabled people)
- By setting out exceptions to the application of the Act's provisions, which apply to a specific protected characteristic in certain situations (e.g. allowing same-sex services in some situations)
- Allowing positive action in limited circumstances (e.g. implementing a 'trigger' policy for people with specific needs, under those specific circumstances)

The law requires that public authorities demonstrate they have had 'due regard' to the aims of the equality duty in their decision-making. Assessing the potential impact on equality of proposed changes to policies, procedures and practices is one of the key ways in which public authorities can demonstrate that they have had 'due regard'. Due regard is demonstrated by the completion of this EIA.

Equality & Human Rights Commission Guidance - Employment Statutory Codes of Practice

<https://www.equalityhumanrights.com/sites/default/files/employercode.pdf>

The Statutory Code of Practice provides further guidance on 'Positive Action':

- Any measures taken to help to alleviate any disadvantage experienced
- Justification must meet one or more of the 3 Aims / the 3 Specific Duties
- Decision making must be based on quantifiable evidence
- Positive action is not the same as positive discrimination, which is unlawful
- Positive action without continued justification may be deemed unlawful

Organisations need to consider:

- Is the action an appropriate way to achieve the stated aim?
- If so, is the proposed action reasonably necessary to achieve the aim?
- In all of the circumstances, would it be possible to achieve the aim as effectively by other actions that are less likely to result in less favourable treatment of others?
- Is the action proportionate, legal, accountable and necessary 'P.L.A.N'?

Equality and Human Rights Commission – Religion or Belief: a guide to the law

<https://www.equalityhumanrights.com/sites/default/files/religion-or-belief-guide-to-the-law.pdf>

Religion or belief: a guide to the law' provides an overview of the protections offered by the Equality Act 2010 and the Human Rights Act 1998 of people with or without a religion or belief. It answers commonly asked questions such as what is indirect discrimination and can it ever be justified, and how much employers are expected to know about religion or belief in order to fulfil their legal obligations.

Equality and Human Rights Commission – Legal Framework regarding Protected Characteristics

<https://www.equalityhumanrights.com/en/equality-act/protected-characteristics#age>

<https://www.equalityhumanrights.com/en/equality-act/protected-characteristics#disability>

<https://www.equalityhumanrights.com/en/equality-act/protected-characteristics#reassignment>

<https://www.equalityhumanrights.com/en/equality-act/protected-characteristics#sex>

Policy Framework

Mayor of London –Police and Crime Plan 2022-2025

<https://www.london.gov.uk/mopac-publications/londons-police-and-crime-plan-2022-25>

Mayor of London setting out his policing plan for London.

This report raises the following key points:

- Reducing and preventing violence – preventing and reducing violence affecting young people; making London a city in which women and girls are safer and feel safer; tackling the harm caused by drugs; reducing reoffending by the most violent and high-risk groups; preventing hate crime; and working together to prevent terrorism and violent extremism.
- Increasing trust and confidence – increasing public trust in the MPS and reducing gaps in confidence between different groups; ensuring that the MPS engages with Londoners and treats them fairly; and ensuring that the MPS, borough councils and all community safety partners respond to neighbourhood crimes such as burglary and anti-social behaviour.
- Better supporting victims – improving the service and support that victims receive from the MPS and the criminal justice service; working to ensure victims receive a better criminal justice response and outcome; and reducing the number of repeat victims of domestic abuse and sexual violence.

- Protecting people from being exploited or harmed – reducing the number of young people and adults who are criminally exploited or harmed; keeping young people in the justice system supported and safe; and keeping people safe online.

MPS direction document 2018-2025

http://mpsweb.intranet.mps/globalassets/campaigns/met-direction---panel/mps_executive-summary_final.pdf

This strategy document sets out the Met's long-term operational priorities from 2018 - 2025. The document provides a vision of the Met in terms of the key features, capabilities and behaviours that it wants, and will need, over the next seven years.

Key Points:

- Focus on what matters most to Londoners.

Violent crime is a key concern and tackling it is a priority in order to protect Londoners.

- Mobilise partners and the public

We know that safety requires action beyond the police service. We will continue to work with partners and communities to help keep them safe and support them in preventing crime.

- Achieve the best outcomes in the pursuit of justice and in support of victims

We have a fundamental responsibility to bring offenders to justice and ensure that victims of crime receive the support they need from us and from others

- Seize the opportunities of data and digital tech to become a world leader in policing

We want to harness data and use technology to our advantage in the pursuit of criminals, rising to the challenge of a fast-moving data-driven digital age.

New Met for London

<http://mpsweb.intranet.mps/globalassets/campaigns/a-new-met-for-london/publications/a-new-met-for-london---july-2023.pdf>

This strategy document sets out the Met's strategic priorities for the period 2023 – 2025. The document provides a vision for how the Met will reset its relationship with the people and communities of London, and its staff.

Key points:

- **Community Crime Fighting** The Met will put more officers and PCSOs into local neighbourhoods and make sure they're delivering against the priorities of Londoners. The Met will work with communities to tackle crime and anti-social behaviour, utilising the specialist resources of the Met to make a difference in the highest crime, lowest trust communities.
- **Culture Change** The Met will embed the values of policing by consent. It build a strong culture focused on delivering for London, maintaining high standards and learning from others. It will be free of discrimination and will better reflect the diversity of London.
- **Fixing Our Foundations** The Met will organise and deploy its people better, giving them

the training, equipment and tools they need to cut crime, using data and technology to foster a precision-focused approach.

MPS VAWG Action Plan

<http://mpsweb.intranet.mps/globalassets/images/frontline-policing--commendations/vawg/pics-and-icons-for-vawg-page/mps-vawg-action-plan-dec-23-final.pdf>

This strategy document sets out the Met's strategic approach to tackling violence against women and girls across London. It is divided into three pillars.

- P1: Building Trust & Confidence
- P2: Relentless Pursuit of Perpetrators
- P3: Safer Spaces

London Race Action Plan

<http://mpsweb.intranet.mps/globalassets/campaigns/london-race-action-plan/london-race-action-plan-2024.pdf>

The LRAP is the Met's strategic plan to tackle racism in all its forms, and is specifically and deliberately focused on London's Black communities, acknowledging the history and trust deficit between them and the Met. It is divided into four pillars:

- P1: Represented
- P2: Respected
- P3: Involved
- P4: Protected

MPS Safeguarding Policy

Policing vulnerable people demands close cooperation within the service and with key statutory partners in health and social care. London's partnership operating context is particularly complex, but the MPS safeguarding hubs allows for effective tiered engagement with police and partners at national, pan-London and local levels.

Examples of categories of abuse are as follows:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect

Privacy Legislation

The following areas of legislation are relevant to the proportionate deployment and use of ANPR.

Data Protection Act 2018

Controls how personal information is used by organisations, businesses or the government. It is the UK manifestation of the European General Data Protection Regulations (GDPR)

<https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

Human Rights Act 1998

Sets out the fundamental human rights for everyone the UK, including the qualified right to privacy.

<https://www.legislation.gov.uk/ukpga/1998/42/contents>

Protection of Freedoms Act (PofF) 2012 and the Code of Practice issued thereunder (PofF Code).

The Protection of Freedoms Bill is part of a programme to safeguard civil liberties and reduce the burden of government intrusion into the lives of individuals.

<https://www.legislation.gov.uk/ukpga/2012/9/contents/enacted>

Consultation

There have been a number of internal and external consultations to gauge public and police attitudes towards the use of the VAWG 100 as a tool for law enforcement. The comprehensive list of engagement is stored in the Excel spreadsheet below and key consultations are documented on the next page.



20205002 VAWG
Consultation Log RED

Equality Implications

The data used to determine the most harmful perpetrators of VAWG reflects MPS the demographics of MPS held data. All male suspects aged at least eighteen on MPS on crime reports that meet the NPCC definition of VAWG are in scope (though those who only appear on one report are automatically descope).

While the searches that select individuals are agnostic of protected characteristics, other than the characteristic of age, it is well known the police data is flawed primarily due to issues of under-reporting, due to issues such as shame or fear of reprisal, and under-recording, due to issues such as officer indifference to particular crimes. The crimes in scope for the VAWG 100 project, i.e. crimes that predominantly affect women and children such as sex crimes and domestic crimes, have long been both under-reported and under-recorded.

Further, the data is vulnerable to the prejudices of members of the public in ways that is impossible for police to control for, such as the decisions of independent witnesses whether or not to report a crime being influenced by the protected characteristics, such as race, of the victims or offenders. It is therefore key for the project to acknowledge that there will be bias and disproportionality in the data we use whilst ensuring that the project does not further aggravate the bias with flawed human judgment.

There is the clear equality point in that this project aims to tackle violence against women and girls. This is predicated on the fact that VAWG as a crime type is a widespread form of offending that does not have a counterpart for men and boys that is on the same scale. VAWG remains a high profile issue within society and requires its own specific plan and intervention.

The project's aim is more specific than tackling violence against women and girls though; it is concerned in particular with *male* violence against women and girls. When we produce the list of c. 35,000 people in London who have committed two or more NPCC VAWG definition compliant crimes in the last 365 days, a low single

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figure percentage of these offenders are female. Due to the specifics of the Commissioner's commitment, all female perpetrators, no matter how harmful, are automatically descoped from the project.

The above being the case, it is to be expected that due to people of colour, in particular members of the Black community, being over-represented as suspects in police data they will be over-represented within the VAWG 100 project. Within this, there is no clear reason to suspect that the one hundred most harmful VAWG offenders would have a different demography by ethnicity when compared against the population of male suspects for NPCC VAWG definition compliant offences perpetrated by those over eighteen. The project therefore should not be aggravating the disproportionality in suspect data.

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).				
Box				
Name of Business Group / Unit, Association, Stakeholder (External)	Why are you approaching them?	Date and method of planned consultation	Outcome of consultation	
Expert Reference Group of the Women's Resource Centre (REDACTED)	Advocacy group in women's needs in relations to safeguarding and domestic abuse	23 rd November 2023 via Zoom, and general email correspondence	Positive feedback from the group, with some practical concerns around data privacy (both in terms of supporting and hindering V100), as well as concerns raised by domestic homicide reviews in relation to cross-force-boundary issues relating to coercive control.	
REDACTED (of Yvette Cooper's private office)	At the time, Yvette Cooper was the Shadow Home Secretary.	2 nd October 2023 via Teams, and general email correspondence	Positive feedback from REDACTED with REDACTED saying that Yvette Cooper would be announcing in the Telegraph Labour's intention, should they form a government, to look at doing this nationally.	
Yvette Cooper, Jess Phillips, REDACTED	At the time, Yvette Cooper was the Shadow Home Secretary, and Jess Phillips was the Shadow Domestic Violence & Safeguarding Minister.	20 th September 2023 via Teams	Positive feedback with an emphasis on how predicting the barriers the project might encounter and how they could be overcome, e.g. training and resourcing, making the most of court orders, inadequacy of IT system, identifying escalatory offending, wider support such as from addiction clinics.	
Met Ethics Panel	They provide ethical insight into, and approval of, new ideas within the MPS.	4 th April 2023 via Teams	Panel was supportive in principle of the idea, with no moral or ethical objections. Additionally discussed some practicalities	

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			of the project, such as whether or not to create a bespoke unit to deal with these offenders.
London Policing Ethics Panel	Key external stakeholder and advisory body	Approx July 2023 in person	LPEP were positive about the idea and methodology. Key recommendations to address were to consider the effects of automation bias, the commission of an independent evaluation, and proactively identify, measure and mitigate algorithmic bias.
MOPAC	MOPAC oversees the MPS and the Mayor of London is effectively our Police and Crime Commissioner	Approx. early September 2023 via email	MOPAC had a pro forma of questions they wished to ask in relation to the VAWG 100, broken down into four categories: evidence base and rationale; transparency and legitimacy; fairness and assurance; and buy-in and integration. No response was received in relation to this.
NPCC VAWG Task & Finish Group chaired by REDACTED	They have a national VAWG reach and need to be informed about new work.	18 th May 2023 via Teams	Purpose of the meeting was to encourage thinking about where the project could learn from what went before. Practical points raised included that this is not 24/7 risk management, there are factors outside our control, the CCHI is not the best tool for VAWG but is the best we have, College of Policing doing some similar work on coercive & controlling behaviour.
MPS Public Protection Superintendents	Key internal stakeholders		
BCU Commanders	Key internal stakeholders		Hosted by REDACTED. Concerns raised about methodology, including why cut off points are at alleged offender 100 (rather than 101) and exclusion of offending history beyond 365 days in age.
Black Police Association, Black Networking Strand	Key internal stakeholders	4 th May 2023 via MS Teams	Expressed concerns about disproportionality in some London boroughs and asked what action we would take to address this.
TfL	Key London stakeholder	4 th May 2023 in person	TfL concerned about how they could contribute, could they have access to the names of the VAWG 100 nominals, in

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			particular those using the London tube and bus network. Additionally, how could AI support this, how this differs from existing processes, whether we would provide victim support, what they should do should a VAWG 100 nominal work for TfL.
Network of Women (REDACTED and REDACTED)	Key internal stakeholders	5 th May 2023 via MS Teams	Only concern expressed was whether or not VAWG 100 project would incorporate police perpetrators, how we would support victims (ie not just focus on enforcement), resourcing additional demand, Claire's Law, sharing with partners.
Met Central Communications Command	Key internal stakeholder		Enthusiasm for the project, whilst noting that MPS systems are location based whereas this project is person based. Asked practical questions about how this might affect the calls they receive, such as whether there will be a marker on the address of a VAWG 100 nominal.
Met Detention	Key internal stakeholder		Enthusiasm for the project, again accompanied by practical questions on what this would mean
MOPAC Violence Reduction Team (REDACTED)	Key external stakeholder	19 th May 2023 via MS Teams	Raised concern about juvenile suspects in domestic crimes not being incorporated into the VAWG 100 project, in particular male children assaulting their mothers.
REDACTED of Oxford University	Academic recommended by Black Networking Strand who could challenge VAWG 100 methodology	16 th June 2023 via MS Teams	No comments on methodology but had questions on whether or not 'joint enterprise' would be incorporated into the VAWG 100.
London RACE IAG	Key external stakeholder	31 st July 2023 in person	No specific comments raised on VAWG 100 project.
Liberty (REDACTED)	High profile Human Rights charity who have previously been critical of MPS.	18 th September 2023 via MS Teams	Did not express an opinion either way, saying that this work does not fall under their remit.
Various Grassroots Charities		5 th June 2023 via MS Teams	Concerns raised about whether or not non-binary perpetrators would be included in the VAWG 100 project, whether or not VAWG offending perpetrated by women would be incorporated and whether cyber

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			offending would be incorporated.
Senior Leaders Meeting	Key internal stakeholders		Hosted by REDACTED.
MPS Commissioner Live	MPS personnel at large		Hosted by REDACTED. Informed the general MPS workforce about the VAWG 100 project and its methodology.
Strategic Insight Unit	Internal stakeholder who hope to undertake similar work		No specific concerns raised.
BBC	Reach a broader audience	https://www.bbc.co.uk/news/uk-england-london-68774239	Article with input from REDACTED and REDACTED to inform the general public of the project and how it works.
General 'Mop Up' Online Survey	Provided people who chose not to make comments openly with a means to communicate their thoughts on the project		Feedback included noticeable positivity towards the VAWG 100 means of tackling VAWG. Concerns raised included: incorporation of female perpetrators; refreshing the stack more frequently than monthly; whether 100 is the 'right' number; the mis-criming of offences; use of AI; partnership working; incorporation of juveniles; earlier intervention; petitioning government for 'whole system' funding; more internal training and resources; change of police culture.
CPS, Probation, Youth Justice Board, Prisons, Victims' Commissioner, MOPAC	All are key stakeholders in the criminal justice system locally and some nationally.	25 th May 2023 via Teams	Mainly provided practical feedback / questions including partnership working with prisons and existing partnerships, diversionary work, disproportionality, community engagement.

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:

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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
Age No impact	The MPS is an equal opportunity employer. Working on or with the VAWG 100 project will be based on business need, independently of characteristics of individual employees.	N/A	N/A	N/A
Race No impact	The MPS is an equal opportunity employer. Working on or with the VAWG 100 project will be based on business need, independently of characteristics of individual employees.	N/A	N/A	N/A
Disability No impact	The MPS is an equal opportunity employer. Working on or with the VAWG 100 project will be based on business need, independently of characteristics of individual employees. Operational Requirements: Role requirements have been set in accordance with MPS Health & Safety Policy, HR Recruitment Policy and MPS Performance Framework	N/A	N/A	N/A

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	https://www.met.police.uk/SysSiteAssets/foi-media/metropolitan-police/policies/strategy--governance---mps-health-and-safety-policy https://portal.psop.policesharedservices.co.uk/k/m/subject/36			
Sex No impact	The MPS is an equal opportunity employer. Working on or with the VAWG 100 project will be based on business need, independently of characteristics of individual employees.	N/A	N/A	N/A
Disability No impact	The MPS is an equal opportunity employer. Working on or with the VAWG 100 project will be based on business need, independently of characteristics of individual employees.	N/A	N/A	N/A
Religion or belief No impact	The MPS is an equal opportunity employer. Working on or with the VAWG 100 project will be based on business need, independently of characteristics of individual employees.	N/A	N/A	N/A
Sexual Orientation No impact	The MPS is an equal opportunity employer. Working on or with the VAWG 100 project will be based on business need, independently of characteristics of individual employees.	N/A	N/A	N/A
Marital Status No impact	The MPS is an equal opportunity employer. Working on or with the VAWG 100 project will be based on business need,	N/A	N/A	N/A

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	independently of characteristics of individual employees.			
Gender Reassignment No impact	The MPS is an equal opportunity employer. Working on or with the VAWG 100 project will be based on business need, independently of characteristics of individual employees.	N/A	N/A	N/A
Pregnancy & Maternity No impact	The MPS is an equal opportunity employer. Working on or with the VAWG 100 project will be based on business need, independently of characteristics of individual employees.	N/A	N/A	N/A
People with dependants No impact	The MPS is an equal opportunity employer. Working on or with the VAWG 100 project will be based on business need, independently of characteristics of individual employees.	N/A	N/A	N/A

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 <u>Potential Negative Impact</u> The project is concerned specifically with offending in the last 365 days and ignores all other offending. As the only relevant offending is recent offending and young people are statistically more likely to be involved in crime, young people are	THE MPS ACCEPT THIS IMPACT The VAWG 100 project is data driven and identifies the most harmful male VAWG offenders aged over eighteen in the last 365 period. These are therefore the people to direct interventions towards, irrespective of their age. Officers must always consider their powers, and other information and intelligence prior	Met Intelligence	Ongoing review	

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disproportionately more likely to be identified by the VAWG 100 project for intervention. This is intelligence-led policing, which will be justified by information held in relation to individuals coming to the notice of police. <u>Potential Positive Impact</u> The use of intelligence and quantitative metrics to place suspects into a stack ordered by harm has the potential to provide the community with confidence that the MPS is trying to reduce the role that flawed human judgment can play in making criminal justice decisions. Additionally, due to only using NPCC VAWG definition compliant offences to place people on the stack is likely to encourage community confidence as these are offences that society at large condemns. This is opposed to more controversial offences, such as possession of cannabis, on which society is more divided.	to taking action. Any actions taken against VAWG 100 offenders, such as arrest, will require a lawful basis and must be proportionate and necessary. <u>Mitigation</u> Officers, and the MPS at large, will be able to highlight the data driven nature of this work. Any executive actions taken on the basis of the VAWG 100 project will be delivered by officers operating within MPS policies and guidance. Much of the police work under the umbrella of the VAWG 100 is protective of young people, particularly those at risk of sexual exploitation. There is also the prevention of indirect harm to young people, such as preventing the intergenerational trauma experienced by young people (in this case girls) when their parents (in this case mothers) are victim-survivors of serious offending (in this case domestic or sexual).			
Race <u>Potential Negative Impact</u> There is an ethnic disproportionality in terms of suspect data held by the MPS. Given that the VAWG 100 project uses only existing data (as opposed to incorporating new data specifically for the project) this disproportionality will be recycle into the VAWG 100. There is no reason to expect that the top 100 people of the stack of c.35,000 would be of a different ethnic breakdown compared with our base population of male suspect over the age of eighteen.	THE MPS ACCEPT THIS IMPACT BASED ON THE FOLLOWING CRITERIA The VAWG 100 project is a tool that identifies offenders based on three criteria: • Their age, which must be eighteen or older • Their number of NPCC VAWG definition compliant offences in the last 365 days, which must be two or more • Their sex, which must be male. No other factors feature in the selection process, including officer judgment that could be affected by unconscious bias	DCS Public Protection	Ongoing monthly reviews	

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The below PowerPoint breaks down the VAWG 100 suspects by ethnicity as at December 2024. 	relating to protected characteristics, in particular race. There are rigorous safeguards around the generation and processing of intelligence that leads to inclusion on the VAWG 100. This includes strict guidance on the weeding of all reports that are over 365 days old to ensure that all offending is recent. Officers must always consider their powers, and other information and intelligence prior to taking action. Any actions taken against VAWG 100 offenders, such as arrest, will require a lawful basis and must be proportionate and necessary.			
Sex <u>Potential Perception Of Negative Impact</u> This project is concerned solely with male violence against women and girls. In this sense there is a negative impact towards males. <u>Positive Impact</u> Male violence against women and girls is a matter of intense public interest and concern, and has recently been classed by HMG as a national threat and a refreshed national framework has brought the police response to VAWG in line with counter-terrorism. The VAWG 100 project considers VAWG offending 'in the round' and due to focusing on the most harmful offenders will prevent future VAWG offending, thereby having a disproportionately positive impact on women and girls.	THE MPS ACCEPT THIS IMPACT BASED ON THE FOLLOWING CRITERIA The VAWG 100 project is designed specifically to target male violence against women. Any 'disadvantage' towards males is therefore not incidental. Male violence against women and girls is a matter of intense public interest and concern, and has recently been classed by HMG as a national threat and a refreshed national framework has brought the police response to VAWG in line with counter-terrorism. Officers must always consider their powers, and other information and intelligence prior to taking action. Any actions taken against VAWG 100 offenders, such as arrest, will require a lawful basis and must be proportionate and necessary.	N/A	N/A	N/A
Religion	THE MPS ACCEPT THIS IMPACT BASED	Met	Ongoing	

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<u>Potential Negative Impact</u>	ON THE FOLLOWING CRITERIA	Intelligence	Review	
Religious convictions have some correlation with a person's particular community, culture and ethnicity. Noting the ethnic disproportionality of data held by the MPS, as discussed above, there may be a disproportionate negative impact on particular religions or denominations that are more common among particular ethnicities, noting especially Black and Brown communities.	The VAWG 100 is an intelligence tool that may assist police officers to identify people who are of interest. It provides a guide to officers/staff about who may be of interest in law enforcement enquiries. Officers then consider their powers and other intelligence and information. Even where an individual is identified as a VAWG 100 nominal by the stacking process, further policing action is not an automatic consequence. Officers must always consider their powers, and other information and intelligence prior to taking action. Any actions taken against VAWG 100 offenders, such as arrest, will require a lawful basis and must be proportionate and necessary.			

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 primary monitoring of this project will be conducted by members of the MO2 VAWG team who will capture data including the following:

- The demographics of the total stack
- The demographics of those in the top 100 who are tasked out
- The demographics of those in the top 100 who are descoped and not tasked out.

Due to the hierarchical way the VAWG 100 project is structured and monitored, it is highly likely (though not absolutely guaranteed) that any activity, such as arrests or charges, stemming from the VAWG 100 project will ultimately be brought to the attention of the project and documented as such.

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?

Met Intelligence produce performance data on a monthly basis to monitor the project.

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

This document will be available on the MPS publication scheme website and is also available for subject access and Freedom of Information Access Requests which regularly come into the MPS.

The MPS Department of Media and Communications have been consulted and this document will be made available on the MPS website.

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>	☒ Yes	☐ 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>	☐ Yes	☐ 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>	☐ Yes	☐ 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>	☐ Yes	☐ 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>	☐ Yes	☐ No
<i>Has the /LRO listed all equality impact identified via their collation and evaluation of data/information and/or consultation activities?</i>	☐ Yes	☐ No
<i>Has the LRO effectively demonstrated taking proportionate and necessary steps to eliminate and/or reduce all identified negative equality impact?</i>	☐ Yes	☐ 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>	☐ Yes	☐ 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>	☐ Yes	☐ No
Line Managers Recommendations:		
Supervisor Name Rank/Band:		Date Completed:

STEP 8B: SENIOR RESPONSIBLE OFFICER (SRO) DECISION MAKING

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).

Reject the Policy / Proposal	☐ Yes	☐ No
Implement the Policy / Proposal	☐ Yes	☐ No
Produce an alternate Policy / Proposal (if so, a new EIA must be completed)	☐ Yes	☐ 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:

Retention period: 7 years