

Overview of learning from the Gangs Violence Matrix

Background

In November 2018, the Met received an enforcement notice from the Information Commissioner's Office (ICO) for contravention of data protection principles in its use of the Gangs Violence Matrix (GVM). In addition to the ICO enforcement notice, the Mayor of London made a commitment to Londoners in his 2016 manifesto to conduct a review of the GVM. This review, published in December 2018, made nine recommendations. Progress against these recommendations was published in January 2021.¹

The learnings from the GVM have informed our organisational learning about data and information governance and focused our efforts on the immediate and medium term data capabilities required to avoid such judgements in future and to make sure our service to the public is exemplary. The principles behind these improvements, and the recommendations in the review of the GVM, extend to other lists held by the Met.

Local learning and improvement

The GVM is an operational policing tool, used to prioritise resources on those with the highest risk of causing harm, and supporting people in escaping exploitation by gangs. This basic concept – collating and using data about individuals known to be involved in criminality or at risk of doing so, is deemed by the police to be a fundamental part of policing and public safety, whether that be a large-scale tool such as the Police National Computer (PNC), down to small-scale, local measures such as the GVM. It is also an element of data processing that is supported and underpinned by the specific Law Enforcement Directive within the Data Protection Act 2018; it was created specifically so that policing could use personal data to discharge its policing purpose. Although relied on by teams across the Met, ownership of the GVM sits within Met Intelligence.

In November 2019, Met Intelligence established an Information Assurance Group to make sure that there is compliance across the datasets held by the Command Unit. This group ensures that key lessons from the GVM are in place against other operational tools. This includes adhering to the ICO checklist for processing information. A key role of the Information Assurance Group is to ensure that for each data set:

- Data is stored in a secure location;
- A Data Protection Impact Assessment is in place and regularly reviewed;
- Sharing is only to occur with partners outside of Law Enforcement Agencies if a Data Sharing Agreement is in place;
- Access logs are in place;
- There is a relevant policy document in place for users;
- There is a specific data retention policy that mirrors the corporate data retention policy.

¹ https://www.london.gov.uk/sites/default/files/gvm_update_jan_2021_final_for_publication_.pdf

Corporate learning and improvement

In addition to the local learning described above, the Met has made positive steps towards establishing broader data and information governance to cover our strategic approach to data, laying the foundation upon which an ethical framework for the use of data can be applied.

Whilst this will reinforce our governance around compliance, it also provides a foundation to govern how we become a more transparent, open and ethical data-driven organisation.

We have invested in strong data governance structures, overseen by the Data Board chaired by the Chief of Corporate Services and with strong Management Board representation. This board maintains the momentum and consistency in the way the Met uses its data and manages information under its control. Supported by the Data Office, this board is accountable for driving the implementation of the Data Strategy and key data capabilities.

In January 2019 the Met appointed a new role, Director of Data, to oversee current and future capabilities, including data compliance. This role sits within Corporate Services and is managed under Strategy and Governance. At this point the Met also appointed a new Data Protection Officer who has directed an overhaul of staff training, processes and corporate independence and oversight of Data Protection Act compliance.

The Data Office has introduced an Information Asset Register, allowing the Met to know the totality of what data it collects, and about what, for the first time. To align work already underway in the Met to ensure we better utilise and manage lists, the Data Office has introduced a set of principles and a core data framework. This framework is mindful of significant regulatory feedback (and subsequent guidance) already issued to the Met and wider law enforcement. This framework and principles were recently audited by the ICO and found to be reasonable, seeing praise from the ICO for the significant developments the Met has made here since 2019.

Data compliance training 'Information and You' is a mandatory course for every member of the Met, officers and staff. The compliance rate is monitored through Data Board.

Based on the learnings from the GVM review, the Met has focused on three areas of assurance and risk mitigation (supported by DARA and the Met Data Board). These are;

1. A full review of 3rd party access to data systems and Information & You (or equivalent) compliance. The findings of this review will drive a reduction in the number of users who may have unsolicited access to wider Met data sets and systems enabling greater control of data management.
2. A wholesale review of the way Met operational users create lists for analysis and insight. Applying the checklist principles from GVM we aim to review and manage authorisation of lists with Data Board oversight.
3. Training, awareness and dedicated advice to guide both front line & senior police decision-makers in the use of Privacy Notices, FOIA Publication Schemes and broader Information Asset Ownership accountabilities so that decision-making on the application of lists, and other data processing is managed at an appropriately senior level.