

## 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	Gang Violence Matrix					
Branch / OCU	Met Intelligence - MO2					
Date Created	20/10/2022 (update to original version of 15/11/2018)	Review Date	20/10/2025	Version	9	
Author	DSU William Wright					

STAFF INFORMATION					GUIDANCE		
Person Completing EIA	DSU William Wright						
Signed					Date	20/10/2022	
Person Supervising EIA/SLT Approval	Lindsey Chiswick						
Signed					Date	20/10/2022	
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	15/11/2018		
<b>SLT OCU / BCU / Management Board endorsing decision</b>				
Name	Lindsey Chiswick	Rank / Grade	Director Of Intelligence	

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 Gang Violence Matrix (GVM) is an intelligence tool used to identify and risk assess gang members across London as victims and suspects. To be added to the GVM a person has to be identified as a gang member based on two or more pieces of intelligence. Once on the GVM people are scored according to violence and weapons offences and intelligence as a victim and suspect. The GVM identifies the most violent gang members who need enforcement action against them and gang members who have been repeat victims of violence and therefore need support to safeguard them from being further victims and to divert them away from gangs.

The overarching aim of the Gang Violence Matrix is to reduce gang related violence, safeguard those exploited or used by gangs and prevent young lives being lost.

The GVM measures the harm gang nominals pose by scoring individuals on the GVM for violence, weapons offences and intelligence. A single GVM has been introduced across London to score gang nominals so that there is equal assessment measures used to assess the risks they pose.

Matrices are owned by local boroughs / Basic Command Units (BCUs) who will work with and share data with their partners to enable a multi-agency approach to tackling gangs in London.

Some of the key benefits of the GVM are:

- It identifies gang members in London and prioritises the current most violent gang subjects.
- It identifies gang members who have been victims of violence and prioritises these to identify the gang members most at risk of being further victims of violence.
- It allows comparisons to be made of individual gang subjects across the MPS.
- It aids the prioritising of resource allocation, ownership of subjects and methods of intervention.
- It highlights possible gaps in activity or intelligence on violent gang subjects.

Subjects are added to the GVM when they meet the threshold of *'Someone who has been identified as being a member of a gang and this is corroborated by reliable intelligence from more than one source (e.g. police, partner agencies or community intelligence).'* They will only feature on the GVM if they fit this definition. The definition of a gang used in the MPS is, A 'gang' is defined as a "...relatively durable, predominantly street-based group of young people who (1) see themselves (and are seen by others) as a discernible group, and (2) engage in a range of criminal activity and violence. They may also have any or all of the following features, (3) Identify with or lay claim over territory, (4) Have some form of identifying structure feature and (5) Are in conflict with other, similar gangs.

This definition is distinct from, and should not be confused with other criminal structures such as organised crime networks, which may merit a different policing approach.

Those on the periphery of gangs, associates of gang members, victims or those exploited by gangs or siblings of gang members do not meet the definition and therefore should not be added to the GVM. Victims of gangs do not go on the Matrix. The individual has to first meet the definition set out above and then any individual meeting this definition will be added. Once added to the GVM all individuals are scored as a victim and

suspect. Individuals are scored as victims to enable the MPS to identify gang members who are repeat victims and therefore may need support from police and partners to prevent them being victim of any further violence.

Being a victim of gangs whether this be violence or other should not be used as evidence of someone being a gang member unless there is intelligence to suggest they were targeted due to being in a gang. Victims on the GVM are automatically scored from the MPS crime recording system CRIS for any violence offences they have been victim of in the last three years. This includes ABH, GBH, Attempted Murder, robbery, sexual offences and rape.

The purpose of this Equality Impact Assessment (EIA) is to assess this proposal for equality impact against those on and affected by the GVM. Conducting this assessment aims to identify disadvantages suffered by any individual and/or group, and by those who are not.

The aim is to mitigate any identified disadvantage by eliminating the impact, reducing the impact or accepting the impact.

This EIA also works towards assisting the MPS to meet its legal requirements for the GVM set out in the 'Public Sector Equality Duty (PSED)', specifically, in relation to the **3 Aims** and **3 Specific Duties** under section 149 of the Equality Act 2010 (the Act).

These aims and duties are as follows

**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 Three 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.

This EIA aims to demonstrate the MPS's commitment to demonstrating 'due regard' and 'real consideration' and meeting the PSED's 3 Aims and 3 Specific Duties.

**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 checked="" type="checkbox"/> Yes	<input 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 checked="" type="checkbox"/> Yes	<input 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 checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
I	Sexual Orientation	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
J	Other Issues	<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> 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**

Prior to 2018

Although an Equality Impact Assessment had not previously been completed specifically on the GVM, MOPAC completed an Equality Impact Assessment on Gangs - Strategic Ambitions for London in 2014. This EIA focused on gangs, with the GVM being a key component and was referenced throughout the document.

Background to GVM

Reduction in violence is a priority in London both for MOPAC and the MPS. This follows an increase in violent offences, particularly knife crime and homicide in the last few years. Gangs are a significant contributor to violence in London and their involvement in violence increases when looking at the most serious and harmful offences. The table below shows the gang proportion of specific violent crime types in the last three years. This table evidences the impact of gangs with a high percentage of firearm discharges linked to gangs, and shows Gang-related violence is significantly more likely to result in serious injury. Figure 1 (below) evidences the need for the Metropolitan Police Service (MPS) to tackle gangs to reduce violence in London.

Figure 1: Proportion of serious violence identified as gang related.

		2017	2018	2019	2020
Homicide	<b>All Homicides</b>	<b>136</b>	<b>134</b>	<b>150</b>	<b>126</b>
	Gang related	27%	34%	22%	13%
	<b>Homicide (Non-DA &amp; Non-CT)</b>	<b>115</b>	<b>105</b>	<b>134</b>	<b>104</b>

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	Gang related	32%	44%	25%	15%
Firearms	<b>Lethal Barrelled Discharge</b>	<b>354</b>	<b>433</b>	<b>214</b>	<b>298</b>
	Gang related	40%	49%	38%	59%
	<b>Lethal Barrelled Discharge - Victim Shot</b>	<b>144</b>	<b>142</b>	<b>75</b>	<b>101</b>
	Gang related	49%	63%	52%	68%
Knives	<b>Knife Injury under 25 (Non-DA)</b>	<b>2138</b>	<b>1827</b>	<b>1271</b>	<b>1198</b>
	Gang related	21%	19%	15%	11%

From inception, the GVM was controversial, with concerns such as disproportionality and data protection being raised.

In November 2018 the MPS received an enforcement notice from the Information Commissioner’s Office (ICO) for contravention of data protection principles in its use of the GVM. In addition to this the Mayor of London, Sadiq Khan made a commitment in his 2016 manifesto that the GVM would be reviewed. This review was published in December 2018.

The review recognised the GVM as a necessary law enforcement tool for reducing violent crime in London, showing reductions across various measures in offending and victimisation amongst the individuals included on it.

However, the review also identified “Young black males are disproportionately represented as both victims and offenders in all serious violence. At a London wide level, the percentage of black, African-Caribbean males on the Matrix exceeds that of the general population, as well as across many crime types, including those most associated with serious gang- or group-related violence.”<sup>1</sup>

In addition the review also comments “Whilst we know that the perpetrators and victims of the crime types targeted through the Matrix are largely young black males, our analysis shows that at present, their representation on the Matrix is disproportionate to their rates of offending and victimisation”<sup>2</sup>

The MOPAC review made a number of recommendations to the MPS which were intended to “address the issues we are able to evidence, disproportionality being one of the biggest. By implementing the recommendations of this review: helping to clarify the aims, improve training, bring consistency to practitioners’ usage and strengthen oversight over the Matrix, we hope to see the population of the Matrix align much more closely with the data on violence in London.”<sup>3</sup>

These recommendations included:

- The MPS comprehensively overhauling the Matrix Operating Model and reviewing the Model annually. It was further recommend that all officers using the Model receive training on how to apply the guidance and to do so consistently across all boroughs.
- A thorough reappraisal of the individuals in the Green category, with a focus on: those that currently score ‘zero-harm’; those that have never had a harm score or have remained in the Green category for their entire time on the Matrix; and those under the age of 18.
- That MOPAC and the MPS engage with the Equality and Human Rights Commission as they deliver the recommendations in the review and the ongoing work of the Gangs Matrix, which would support the MPS’ work to further assess issues around human rights, disproportionality and produce an Equalities Impact Assessment. (This was later undertaken by Davie Wolfe QC).
- The MPS strengthen their governance of the Matrix and the officers and partners that use it, creating

<sup>1</sup> Review of the Metropolitan Police Service Gangs Matrix, MOPAC 2018, p57

<sup>2</sup> Review of the Metropolitan Police Service Gangs Matrix, MOPAC 2018, p57

<sup>3</sup> Review of the Metropolitan Police Service Gangs Matrix, MOPAC 2018, p64

single points of responsibility on each Borough Command Unit.

- The MPS urgently improve their current Matrix processes to ensure that personal data and information are stored, managed, shared, protected and transmitted safely and appropriately.
- The MPS improve transparency by producing, publicly available, plain English and accessible information that answers frequently asked questions about how the Matrix works and its purpose.

In order to address these recommendations a MPS Gangs Matrix Oversight Group was established in March 2019 to monitor progress in implementing the recommendations along with managing the ongoing work to comply with the ICO enforcement notice. This has resulted in the following

#### GVM SOP:

The production of a new MPS GVM Standard Operating Policy (SOP) and policy document which is shared to officers and staff within the MPS.

The SOP outlines procedures for the GVM, who should use it and how it should be used by.

- Setting out the training and awareness requirement
- Identifying Governance and Audit for the GVM
- Identifying relevant definitions for gangs and gang nominals
- Setting out Guidance and process for GVM users
- Setting out the roles and responsibilities of different units within the MPS and for partners using and managing the GVM

The MPS has a full training regime for the GVM. In 2019 all Superintendent leads for the GVM were trained as well as anyone processing data on the GVM. To access the GVM officers need to complete data protection training and have signed authorisation forms from a Superintendent or equivalent.

#### Auditing

Audits are now completed in two ways; monthly system audits to review access to the GVM by users and physical audits in BCUs by an Inspection and Review team.

#### Data Protection

In response to both the MOPAC recommendations and the ICO enforcement notice a Data Protection Impact Assessment (DPIA) was produced for the GVM.

The DPIA:

- Describes the nature, scope, context and purposes of the processing;
- Assesses the necessity, proportionality and compliance measures;
- Identifies and assesses risks to individuals; and
- Identifies any additional measures to mitigate those risks.

In addition, in line with the requirements to identify and minimise the data being processed under the Data Protection Act 2018, the MPS have a retention policy specific to the GVM. This mandates that the GVM is now hosted on Box, which is a secure, auditable system with effective controls to restrict access. Only the most recent version of the GVM will be accessible with the previous versions archived for four years and access limited to a small number of staff in the Intelligence Command.

Following the ICO enforcement notice the MPS completed Data Sharing Agreements (DSAs) with all agencies, Local Authorities and government agencies who received information from the GVM.

After reviewing the steps taken by the MPS, the ICO confirmed in February 2020 that it was satisfied that the required improvements had been made, and the Enforcement Notice was discharged

External Website

To enhance transparency, in February 2019, the MPS has launched an external public facing website providing information on the GVM. Information on the website includes what the GVM is, how it works, how names are added and removed and who uses the GVM. The website also includes some key documents produced relating to the GVM including Data Protection Impact Assessment (DPIA), legal mandate, the publication of figures showing breakdowns of the GVM as well as the Information Commissioners (ICO) Enforcement Notice and the MOPAC review of the Gang Matrix.

Equality Impact Assessment & Public Sector Equality Duty

In November 2018 the MPS completed an Equality Impact Assessment (EIA) for the GVM.

A progressive initiative that is being piloted in the MPS is the Concern Hub. The hub was launched in May 2019 in Lewisham borough and is a forward thinking, all systems approach to risk and vulnerability posed to young people under the age of 25. The concern hub brings together current partnership practises in relation to gangs, knife carriers, victims and perpetrators of serious violence, child sexual exploitation, missing, criminal exploitation, county lines and other aspects of human trafficking. The pilot disaggregates individuals scored green on the GVM. The Concern Hub does not focus on 'labels' but instead recognises drivers and complex issues that affect young people with a view to identifying risk at the earliest opportunity. Safeguarding outcomes will range from volumetric reductions in violence to positive involvement with education, training or employment. A range of diversionary options will be available with the team led jointly by police, Local Authority and Childrens' Social Care. All young people who are part of the Concern Hub will be informed. There are no adverse inferences.

The ICO have been consulted throughout and the DSA drawn up with their feedback. The pilot will be reviewed periodically before any consideration for wider roll out.

The first draft suggests 302 subjects. 40 of these will be the live multi-agency case managed individuals. The remainder are on the dormant list, from which they will come off after three-six months of not coming to notice or engagement with a single agency.

Approach

In reviewing our approach the MPS has consciously considered the special duty it owes to these impacted groups under our Public Sector Equality Duty. Specifically, we have sought to give due consideration in our approach to the GVM to, a) eliminating unlawful discrimination b) advancing equality of opportunity between people who share a protected characteristic and those who don't c) fostering good relations between those who share a protected characteristic and those who do not. The GVM Equality Impact Assessment is published on the MPS external website and affirms our commitment to demonstrating due regard to meeting the PSED's specific aims and duties. We consider the EIA is a live document and was developed iteratively based on feedback and learning.

In order to inform the EIA, the MPS engaged in constructive conversations with numerous stakeholders and partners to build its understanding of the effect of the GVM on impacted groups. This consultation identified a number of areas where GVM policy and policing practice may directly or indirectly have adverse effect on impacted groups. This along with the MPS response to the MOPAC review has led to changes in some areas to remove adverse effects. In other areas where the MPS believed its actions were proportionate to the threat they have sought to mitigate, they have tried to reduce adverse effects by implementing new controls. These changes are reflected in the new policy and practice introduced for the Gangs Violence Matrix and tactical guidance for operational staff contained within the 'Gangs Toolkit'.

The concerns and MPS response listed below are identified as issues falling under Public Sector Equality Duty raised to the MPS during the consultation process on the Gangs Violence Matrix and MPS Gangs Toolkit.

**Concern** - The GVM is a discriminatory tool that disproportionately targets ethnic minority communities, particularly young, black men. (MOPAC Community Reference Group / Amnesty / Stopwatch / various media articles)

**MPS response** – There is clear criteria for the inclusion of subjects on the GVM, based on auditable intelligence. The population of the GVM is checked regular to ensure compliance to this criteria. The GVM

focuses on gang-related crime, and specifically on serious violence. The MPS believes collection of this data is proportionate in fulfilling a primary policing duty to keep people safe. The GVM population reflects Police data and Accident and Emergency data, which indicates that young, African Caribbean men are disproportionately represented as offenders and victims of serious violence. The MPS is committed to working with MOPAC to understand the reasons for this disproportionality. As part of this the MPS are represented and questioned at the MOPAC Community Reference Group which is chaired by the Deputy Mayor.

**Concern** – The GVM is not effective at preventing violence within communities. (MOPAC Community Reference Group/Amnesty/Stopwatch/media coverage)

**MPS response** – The MPS believes the GVM is a proportionate and effective tool in tackling violence and keeping the public safe. The MOPAC Review of the GVM (December 2018) stated that ‘the Gangs Matrix does appear to reduce offending and victimisation amongst those included on it’ (p39) and concluded it was a valuable tool for police and partners.

**Concern** – Why are subjects not informed of their inclusion on the GVM if it is supposed to be about safeguarding? (IAG meetings, MOPAC Community Reference Group)

**MPS Response** – This question forms part of the frequently asked questions section on the MPS GVM website.

The MPS recognises that some within impacted communities believe subjects should have the right to be informed of their inclusion within the GVM. The GVM is an intelligence tool supporting live policing operations, including enforcement and investigations. Specific information, such as individual subject details, could frustrate the policing purpose of the GVM and compromise policing effectiveness. The MPS therefore believe it is proportionate that individual subject details are not shared publically. Where the GVM identifies preventative interventions are most appropriate for subjects, information is shared through established multi-agency safeguarding arrangements. The above and many other aspects of data protection are outlined within the Data Protection Impact Assessment (DPIA) for the Gang Violence Matrix which is available on the MPS external website.

**Concern** - The MPS are not transparent about the Matrix. It is a secretive tool and this had led to some myths and half-truths circulating within the ethnic minority communities. (Community Reference Group)

**MPS Response** – The GVM is an intelligence tool and sharing elements of it would frustrate its policing purpose. The MPS has sought to minimise the adverse impact of this approach by taking steps to improve understanding of the GVM across communities. An external website has been published to share more information about the GVM. This website also includes a number of key documents in relation to the GVM. These include FAQs, ICO EN, MOPAC review, Legal mandate, DPIA, EIA and quarterly figures which demonstrate the make-up of the GVM and aids transparency.

**Concern** – The GVM criminalises many vulnerable individuals who present little risk around violence, including ‘Green nominals’ and zero scorers. (Community Reference Group)

**MPS Response** – The GVM is designed to inform police and partner interventions, from enforcement to safeguarding. The GVM clearly identifies those who present a risk of committing gang violence and those who are likely to be victims of gang violence. The MPS consider the inclusion of ‘Green nominals’ and ‘Zero scorers’ to be proportionate to achieve this policing purpose. To reduce any adverse impact each BCU is required to review their GVM on at least a quarterly basis to ensure that those who have exited gang life are removed. Update: as of 31/10/22 the Met has taken a decision to remove all the ‘Green nominals’.

**Concern** – There is no assurance or accountability on the GVM lists held locally or across the MPS. (Community Reference Group)

**MPS Response** - The MPS fully accepts that management and application of the GVM must be subject to independent oversight to satisfy its duty toward community reassurance. We have worked closely with the ICO and MPOAC to introduce new policy, data standards, governance and compliance arrangements. On 14 February 2020 the ICO confirmed the MPS had successfully met all recommendations set out within its Enforcement Notice served in November 2018.

**Concern** - The GVM is not being used consistency across all London boroughs. (Community Reference Group)

**MPS Response** – The MPS recognises consistency of GVM practice is important in maintaining confidence



from impacted groups and the wider community. The MPS has worked with ICO and MOPAC to introduce new policy and practice adopted across all BCUs. Training was provided between March and June 2019 for all local users of the GVM which includes those engaged in policing gang-related violence. This includes Police Officer ranks from constable through to Superintendent. Training is now delivered on a regular basis to local officers updating and managing the GVM. An audit and inspection regime has been established to ensure compliance.

**Concern** – It is not clear who the GVM is shared with? (Community Reference Group)

**MPS Response** – Impacted groups expressed concern regarding the practice and purpose of sharing of personal data held by police. The MPS considers data sharing to be critical in achieving the purpose of the GVM, as it enables appropriate preventative interventions to be delivered by partner agencies. The MPS has worked with the ICO to ensure information sharing meets data protection requirements, including Data Protection Impact Assessment and Data Sharing Agreements. To aid transparency the MPS has published its DPIA and data sharing arrangements on the GVM website.

**Concern** - Do associates and siblings of gang members go on the GVM? (IAG meetings)

**MPS Response** – This question forms part of the frequently asked questions section on the MPS GVM website. To address this concern the MPS has published clear policy on the criteria for inclusion on the GVM website. Siblings and / or associates of gang members do not go on the GVM unless they personally meet this criteria.

**Concern** – Social media, and music videos particularly, is being used as intelligence to evidence gang membership (MOPAC Community Reference Group)

**MPS Response** – Social media and music are important in many people's everyday lives. The MPS recognises that many within the black community believe the police view certain music styles, particularly 'drill' music, as criminal in nature. The MPS does not take this position and has produced guidance and training to staff on social media and drill music videos that explicitly makes this clear. The guidance sets out clear criteria for what may support evidence of gang membership within social media and be suitable for inclusion on the GVM.

**Concern** – MPS shares data with partners to use unfair partnership enforcement tactics, including housing evictions. (Community Reference Group)

**MPS Response** – The MPS recognised that some partner enforcement tactics impact beyond the targeted subject, to affect families who may be entirely innocent of any criminality. Given the representation within the GVM population these tactics disproportionately affects the wider ethnic minority community. For this reason the new 'MPS Gangs Toolkit' no longer includes seeking partnership enforcement such as housing eviction. This type of activity against the families of those on the GVM is no longer part of the toolkit.

**Concern** – The MPS does not differentiate between adults and vulnerable children in its approach to gang-related crime. (Community Reference Group)

**MPS response** - In the new Toolkit, there is a focus on children who find themselves on the Gangs Violence Matrix. This is identified that those under the age of 18 need to be treated differently to those over the age of 18. This is in accordance with Working Together 2018. Often it can be difficult to differentiate between children who are vulnerable or exploited and the resultant criminality. Diversion, partnership working and family engagement is now at the heart of the tactics to ensure a holistic response is used in relation to children. Ensuring officers who work with this cohort have some training in contextual safeguarding and trauma informed practice. Children who have applied for refugee status or who have come into the UK from war torn countries may need additional support. The toolkit is reflective of this.

In 2020 David Wolfe QC, an experienced equalities and human rights lawyer, was instructed by MOPAC to carry out a review of compliance by the MPS with the Public Sector Equality Duty as part of the 2018 recommendations. The review identified a number of areas of learning from which the MPS have created PSED Terms of Reference (ToR). This sets out how the MPS will revise current GVM arrangements, ensuring that equality considerations will be a more explicit part of the thinking and decision-making at every stage, drawing on specialist expertise in equality and inclusion issues from within the MPS – from first draft, to final approval. This will become a continuous process and will see the GVM policy and processes - including the associated training materials – kept under regular review, with decision making in relation to those materials captured. The current version of the ToRs is published on the MPS Website.

At the MPS Quarterly Gangs Violence Matrix Overview Meeting in April 2021 it was agreed to move the GVM training from initial training to also include Continuous Professional Development. The training materials are being updated and will be delivered to editors of the GVM. This training includes a section on the EIA and the Public Sector Equalities Duty.

The Gang Violence Matrix has been in operation for a number of years and from this data being managed over this period the three key protected characteristics identified are age, race and sex. The other characteristics have not been identified as being impacted on from processing the GVM and therefore resources are prioritised in monitoring the key characteristics identified.

Age - The majority of individuals on the MPS GVM are young people with those aged under 25 making up 60% of the Matrix cohort. This includes 75 (4%) who are children (aged 16 and under) and 142 (8%) who are under 18. Young people are also more likely to be victims or suspects of violent crime particularly knife injury offences as well as gang related violence. Due to this there is an impact to young people. To address this there are a large number of interventions available to those who are under 25. The MPS works closely with a number of statutory and non-statutory partners to assist in safeguarding these young people as well as working with them to remove them from being involved in gang related criminality. There are less interventions available to those over 25. Any housing relating issues will be supported via local YMCA or through local authority housing in particular circumstances.

Race – People from ethnic minority backgrounds are disproportionately victims of violence in London. This disproportionality increases as the severity of the violence increases. Police data and Accident and Emergency data indicates that young, African Caribbean men are disproportionately represented as offenders and victims of serious violence. The GVM is reflective of this.

The GVM also draws on intelligence reporting linked to gangs and serious violence.

Figures 2 and 3 show key violence offences and the proportion of victims and offenders that are African Caribbean.

Currently 78% of the GVM population are African Caribbean.

Figure 2: Proportion of African Caribbean ethnicity as offenders by crime type<sup>4</sup>

Serious Violence Type	Proportion of Offenders African Caribbean
Knife Homicide - Victims under 25	71%
Lethal Barrelled Firearm Discharge	70%
Homicide - Victims Under 25	68%
Knife Injury Victim Under 25 (Non DA)	57%

Figure 3: Proportion of African Caribbean ethnicity as victims by crime type<sup>5</sup>

Serious Violence Type	Proportion of Victims African Caribbean
Knife Homicide - Victims under 25	69%
Lethal Barrelled Firearm Discharge	56%
Homicide - Victims Under 25	60%
Knife Injury Victim Under 25 (Non DA)	47%

This may place further strain on community police relations where confidence in the police for Black and Minority Ethnic Londoners' is already lower than that of white Londoners.

<sup>4</sup> Review of the Metropolitan Police Service Gangs Matrix, MOPAC 2018, p58

<sup>5</sup> Review of the Metropolitan Police Service Gangs Matrix, MOPAC 2018, p58

**NOT PROTECTIVELY MARKED**

The MPS have worked closely with MOPAC to develop a Community Engagement strategy for the GVM to improve understanding and seek feedback on the GVM across communities in London. We are also exploring how best to engage with those most affected by serious violence, including through the use of digital and social media. The MPS has also welcomed engagement with many voices in the fields of human rights and equality, including Amnesty International.

Sex - Males are disproportionately affected both as gang-members and as victims. Women and girls are affected both through gang membership and exploitation including sexual exploitation. There are intelligence gaps around the number of females involved in gangs, the number of female gangs and their involvement in gangs and Gang-related violence. This is shown within the individuals on the Gang Violence Matrix, with only 5 females which is 0.28% of the Matrix population. When looking at knife crime and gun crime in London the vast majority of victims and suspects are males. When females are victims of knife and gun crime it is sometimes when they are innocent bystanders during exchanges of violence between individuals or groups.

*Any breakdown figures of the matrix shown above relate to the Gang Violence Matrix as of 30/09/2022.*

**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).

Consultation records are stored on the Shared Drive at the file path:

S:\All HQ Departments\Specialist Crime\Met Intelligence\04. SCO Intel Dev\ART\Team 2\Jon Mott\Matrix\ICO Enforcement Notice\GVM Consultation - EIA

This includes documents shared with Independent Advisory Groups (IAG) including Frequently Asked Questions (FAQs) and a briefing document. Minutes and agendas from some of these IAG meetings and various emails relating to these IAG emails and consultation documents.

Name of Business Group / Unit, Association, Stakeholder (External)	Why are you approaching them?	Date and method of planned consultation	Outcome of consultation
Independent Advisory Group (IAG) chairs from across the MPS	IAGs are a key asset working with the MPS to help build confidence in policing in London and to provide feedback from communities about various aspects of policing.	07/03/2018 Briefing document emailed	Briefing document and Frequently asked questions was sent to Independent Advisory Group chairs. This was done to inform IAGs and for further dissemination to communities to provide a better understanding of the Gang Violence Matrix.
Territorial Policing (TP) Independent Advisory Group (IAG)	The TP IAG includes community members from all 32 boroughs so enables consultation across the whole of London.	23/04/2018 TP IAG meeting	A briefing about the GVM was presented at a TP IAG meeting to Inform the group about the GVM and to keep them updated on changes the MPS is looking to make to improve the Matrix moving forward to build confidence in communities that the Matrix is a valid policing intelligence tool and is being used in the right way. A number of questions were asked around aspects of the Matrix including disproportionality, process for removal and consistency. These were answered during the meeting and positive feedback was received.

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<p>Race Independent Advisory Group (IAG)</p>	<p>The Race IAG is a group with key community members from around London to discuss issues with Policing and race which is particularly relevant to the Matrix due to its disproportionally toward ethnic minorities.</p>	<p>18/06/2018 Race IAG meeting</p>	<p>A briefing about the GVM was presented at a Race IAG meeting to Inform the group about the Gang Violence Matrix and to keep them updated on changes the MPS is looking to make to improve the Matrix moving forward to build confidence in communities that the Matrix is a valid policing intelligence tool and is being used in the right way. A number of questions were asked including disproportionally, whether individuals are made aware of their inclusion, process for removal and inconsistencies. It was explained individuals are not made aware of their inclusion as this could in some circumstances impact on policing operations. Removal reasons were explained to the group and the MPS business change to Basic Command Units (BCU) which will help improve consistency in the Matrix. These were answered during the meeting with support for the Matrix shown by IAG members. There were also some comments about processes in terms of collating data on individuals put forward but not added to the Matrix.</p>
<p>Trident Independent Advisory Group (IAG)</p>	<p>The Trident IAG includes community members who work with Trident around Gang crime and firearm offending.</p>	<p>02/05/2018 Trident IAG meeting</p>	<p>The Gang Violence Matrix was discussed at the Trident IAG in May following the release of the Amnesty Report on the GVM and in November following the Information Commissioners Office (ICO) issuing the MPS with an enforcement notice.</p>
<p>MOPAC</p>	<p>The MPS have been working with MOPAC around the GVM since 2017 following a review of the Matrix by MOPAC which was specific commitment in the Mayors Police and Crime Plan and also in his 2016 election manifesto.</p>	<p>Throughout 2018 - 2022 Meetings, emails, phone calls</p>	<p>The MPS have been working with MOPAC around the GVM since 2017 following a review of the Matrix by MOPAC which was published in December 2018. Analysis by MOPAC has identified a number of key successes of the Matrix and has also highlighted some areas of improvement. As a result of the MOPAC review of the GVM Community Reference Group Meetings were set up including some</p>

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			key stakeholders like Amnesty International, Stop Watch. The MPS attends these meetings.
MOPAC Community Reference Group	MOPAC started the Community Reference Group as part of manifesto pledge to review the Gang Violence Matrix. The MPS attend these meetings to provide an update on the work the MPS are doing to meet the ICO Enforcement Notice recommendations and the MOPAC recommendations.	From 2018 to 2020 Meetings	Consultation is still ongoing. The MPS have provided updates around the ICO EN which was met in February 2020. The Reference Group have provided key feedback and concerns around the GVM during these meetings. This includes concerns around green nominals and zero scorers.
Information Commissioners Office (ICO)	The ICO issued the MPS with an Enforcement Notice on the use of the GVM in October 2018. The ICO are a key stakeholder in terms of data protection and making sure the GVM is being used within data protection legislation.	2018 to 2020	The MPS engaged with the ICO In January 2018 as part of their interest in the GVM. This included centrally and in three London boroughs. Following serving the MPS with an Enforcement Notice the MPS provided monthly updates to the ICO on progress against recommendations set, as well as a detailed plan around how the MPS met these recommendations at the end of the EN and beyond. The MPS also met with the ICO on a number of occasions to show them some of the changes made.
Directorate of Legal Services (DLS)	DLS have provided the MPS with legal advice on the GVM as part of the MPS review of the Matrix.	Throughout 2018 and 2019  GVM Task and Finish Group meeting	DLS have produced a legal mandate for the GVM and offered advice and support during a variety of meetings and consultations.
Specialist Crime (formerly Trident Gang Crime Command)	Specialist Crime are the most significant central proactive unit tackling gangs in London and previously started and had governance of the Matrix	Throughout 2018 and 2019  GVM Task and Finish Group meeting & Gang Crime Fighters meetings	Trident are refreshing the Gangs Operating Model (GOM) which is Policing manual on tackling gangs through enforcement and diversion which has been a discussion point at various Task and Finish Group meetings.
Information Shared Support Unit	The ISSU lead on data protection	Throughout 2018 and	Following discussions with the ISSU the MPS

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(ISSU)	for the MPS as well information requests including subject access requests and Freedom of Information access (FOIA) requests.	2019  GVM Task and Finish Group meeting	have produced a Data Protection Impact Assessment (DPIA) for the GVM.
Met Intelligence	Met Intelligence is a key stakeholder on the GVM and will now have governance of the Matrix.	2018 to 2022  GVM Task and Finish Group meeting & Gang Crime Fighters meetings	Agreed to take on governance of the GVM and will work with TP to provide training for the Matrix to support meeting ICO recommendations locally.
Frontline Policing (FLP)	Gang Violence Matrices are owned locally in BCU boroughs where they have the responsibility to make sure individuals shown on their Gang Violence Matrices are current and relevant. They work with partners to tackle gangs locally in terms of enforcement and prevention.	2018 to 2022 GVM Task and Finish Group meeting & Gang Crime Fighters meetings	FLP have been involved in meetings relating to the GVM both at Gang Crime Fighters and Gang Violence Matrix Task and Finish Group meeting. Training will be provided and they will continue to own the Matrix locally in new Basic Command Units (BCUs).
Ealing Independent Advisory Group (IAG)	The Ealing IAG includes community members who live and work in the borough of Ealing.	12/07/2018  Ealing IAG meeting	The GVM was discussed at the Ealing IAG following a request from the group to have an update from the MPS on the GVM following various external interest in the Matrix. It was a useful and engaged meeting with several questions from IAG members relating to entry on the Matrix, the purpose and vulnerability side of gangs including county lines. The IAG were supportive of the use of the Matrix and understood why the MPS used the Matrix.
Living in Hackney Scrutiny Commission. Partners in attendance included local Hackney councillors, Community Safety Managers, Integrated Gangs Unit Manager and Amnesty International	Hackney are a key gang borough in London and requested for the local DSU and a central representative to attend to brief on the GVM and the MPS response to the ICO Enforcement Notice. Partners include Amnesty International who are a key partner to consult with following criticism from Amnesty on the	24/01/2019  Meeting	Detective Chief Superintendent (DCS) Ivan Balhatchet and Detective Superintendent (DSU) Claire Crawley briefed the meeting around the GVM and the MPS response to both the ICO Enforcement Notice and the MOPAC GVM Review. This was well received by the group and led to a number of questions. Amnesty International raised concerns that were outlined in their Trapped in the Matrix report which was released in Oct-18 but were

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	Matrix in their Report 'Trapped in the Matrix' which was released in October 2017.		pleased to see the MPS making steps to make sure the Matrix was compliant with data protection.
Trident Independent Advisory Group (IAG)	The Trident IAG includes community members who work with Trident around Gang crime and firearm offending.	06/02/2019 Trident IAG meeting	Detective Chief Inspector (DCI) Phil Mills - Met Intel attended Trident IAG and briefed the group on the GVM. This included details of Equality Impact Assessment (EIA) being produced, concern hub pilot in Lewisham. A number of questions were asked including about training, review and removal process, police response to an offenders Red, Amber, Green risk score (RAG), how gang affiliation is justified and more. They were supportive and happy the MPS is producing an EIA and would like the MPS to do roadshows where the MPS alongside the IAG meet local communities and jointly explain the Matrix. This is being considered as part of the Community Stakeholder consultation work around the GVM.
Wandsworth Independent Advisory Group (IAG)	The Trident IAG includes community members who work with Trident around Gang crime and firearm offending.	19/02/2019 Wandsworth IAG meeting	General briefing given on the GVM with local BCU Gangs Detective Inspectors (DI) supporting from a local perspective in terms of partnership work locally. Briefing included details of new external website on the Matrix and changes being implemented to meet the actions set by the ICO. Q&A followed the briefing with a number of questions about the Matrix including age profiles, partnership working, diversion work and whether subjects are informed of their inclusion. IAG Chair was keen to know how the IAG can help the Police with the GVM locally. New website will be forwarded to IAG members.
Independent Advisory Group (IAG) Chairs across the MPS	IAGs are a key asset working with the MPS to help build confidence in policing in London and to provide feedback from communities about various aspects of policing.	20/02/2019 Email	The new website for the Matrix has been sent out to enhance knowledge of the GVM and the website through IAGs so these can be further passed out to local communities.



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Tayo Prince – SNB Chair Lewisham	Bi monthly meeting	21/05/2019 Meeting	No concerns raised
Eileen Glover – SNB Chair Greenwich	Bi monthly meeting	21/05/2019 Meeting	No concerns raised
Lewisham Safer Stronger Scrutiny Committee	Presentation at meeting	22/05/2019 Presentation at Meeting	No concerns raised and reassured with steps taken
Gordon Glean – IAG Chair Lewisham	Bi monthly meeting	10/06/2019 Meeting	No concerns raised
Independent Advisory Group (IAG) chairs across the CW BCU (Covering Westminster, Hammersmith and Fulham and Kensington and Chelsea).	IAGs are a key asset working with the BCU to help build confidence in policing in London and to provide feedback from communities.	26/06/2019 Meeting	The role of the Integrated Gangs and Exploitation was highlighted. The benefit of the Gangs Violence Matrix was explained so that the communities understand how this reduces offending and crime.
Westminster Council IGU	To contextualise the working relationship and benefits they contribute to and to be transparent.	18/07/2019 Meeting	Context understood – no queries raised
Somali public forum.	The BCU has had two murders from the same direct Somali community. They criticised that they could not see what police work was happening. I saw this an opportunity for the community to understand how we reduce offending and victimisation.	18/07/2019 Somali Public Forum meeting	No negative feedback received
Westminster Council Youth Crime Prevention Partnership	To contextualise the working relationship and provide transparency on why the GVM is used.	23/07/2019 Personal briefing	Good feedback
Tower Hamlets - SNB Chair, deputy and panel members.	The SNB monitor police performance using data supplied by MOPAC so as to hold the local police to account as a 'critical friend'. The SNB also develops and	03/06/2019 Phone/email	The SNB were happy with the information provided to them and did not offer any comments or feedback re the context, findings or actions.

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	encourages the engagement between police and the wider members of the community.		
Tower Hamlets - IAG Chair & deputy.	The IAGs act as a 'critical friend' to scrutinise policing and policy decisions and debrief incidents and operations.	03/06/2019 Phone/email	The IAG stated that the information provided neatly summarised the context, findings and actions. The only suggestion put forward was that in the circulating email a link was given to the Met's glossary: <a href="https://www.met.police.uk/foi-ai/af/accessing-information/met/glossary/">https://www.met.police.uk/foi-ai/af/accessing-information/met/glossary/</a> . Ideally the specific terms would be extracted and included in a supporting documents that was sent to partners.
Hackney - SNB Chair & deputy.	The SNB monitor police performance using data supplied by MOPAC so as to hold the local police to account as a 'critical friend'. The SNB also develops and encourages the engagement between police and the wider members of the community.	03/06/2019 Email/follow up meeting to be held on Wednesday 12/06/19.	The SNB stated that they understand the information provided and offered no further comments or feedback.
Hackney - IAG Chair.	The IAGs act as a 'critical friend' to scrutinise policing and policy decisions and debrief incidents and operations.	03/06/2019 Email	The IAG did not offer any comments or feedback re the information provided to them.
Independent Advisory Group (IAG) chairs across Central West BCU. (This covers Westminster, Kensington and Chelsea and Hammersmith and Fulham boroughs.)	IAGs are a key asset working with the BCU to help build confidence in policing in London and to provide feedback from communities.	26/06/2019 AW BCU IAG Meeting	The role of the Integrated Gangs and Exploitation was highlighted. The benefit of the Gangs Violence Matrix was explained so that the communities understand how this reduces offending and crime.
MOPAC Reference Group	This group was part of the MOPAC review of the GVM. The MPS were invited to attend the group's meeting and provide updates on the GCM.	24/06/2019 Attended meeting of group	Update given on MPS action plan to implement the recommendations from the ICO and the MOPAC review. Discussion of engagement strategy.
MOPAC Reference Group	This group was part of the MOPAC review of the GVM. The MPS were invited to attend the group's meeting and provide updates on the GCM.	08/11/2019 Attended meeting of group	Update provided on the status of the ICO recommendations and the MOPAC recommendations. I then asked for advice on our communications strategy and shared draft wording for a video explaining the GVM. Feedback received from attendees which will

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			be incorporated into the video.
Merton S&SCMG	S&SCMGs assist to build confidence in the MPS S&S strategy and feedback to the community. They are critical partners	20/06/2019 Merton S&SCMG Meeting	General briefing given by Partnership Inspector followed by Q&A session. No concerns, happy with changes
Enfield YOU	The YOU work with young offenders locally looking at rehabilitation following offending behaviour, those individuals are often affected by the Matrix and were fully aware of its existence and this can influence how they are dealt with during rehabilitation	24/06/2019 Face to Face by Detective Sergeant	Brief summary of the changes and restrictions around ICO review and how info sharing can be completed in the interim to assist them in their risk assessments when dealing with young offenders associated with different and rival gangs.
AW BCU Proactive Gangs Unit	To contextualise the work that they are tasked with.	04/07/2019 Briefing sent via email, requesting staff are given time to read it.	Circulated - no queries raised.
AW BCU Detective Inspector for YOT/IOM/Jigsaw	To contextualise the work that they are tasked with.	04/07/2019 Briefing sent via email, requesting staff are given time to read it.	Circulated - no queries raised.
Wandsworth S&SCMG	S&SCMGs assist to build confidence in the MPS S&S strategy and feedback to the community. They are critical partners.	23/07/2019 S&SCMG meeting	General briefing given by Partnership Inspector followed by Q&A session. No concerns, happy with changes
Westminster Council Youth Crime Prevention Partnership	To contextualise the working relationship and provide transparency on why the GVM is used.	23/07/2019 Personal briefing	Good feedback
Ealing Borough Independent Advisory Group (IAG)	Monthly meeting between partners in Ealing borough-discussion about current gang tensions in Acton	01/08/2019 MAVES meeting	Members of SA gang who are on the matrix were discussed due to the heightened tensions between these youths and currently identified youths in North London.

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Kingston Independent Advisory Group (IAG)	IAGs are a key asset working with the MPS to help build confidence in policing in London and to provide feedback from communities about various aspects of policing.	06/08/2019 Kingston IAG meeting	General briefing given by SNT Inspector followed by Q&A session. No concerns, happy with changes
Davina Smith: Community Safety Manager - Brent Local Authority.	Brent LA lead for Violence & Community Safety	05/05/2022 - Face to Face	NW BCU - Proactive DCI discussion with LA Partner re collaboration to reduce violence across Brent LA - to be achieved through improved information sharing and joint resourcing/focus on violence hot spots and individuals linked to violence. Discussion and explanation of GVM to improve partner understanding of data-set. Resulting in agreement to share GVM with partners. Subsequently approved and shared through MO2 with confirmation by Data Office of ISA between MPS and Brent LA.
Christopher Kelly: Barnet LA Strategic Lead on Violence, Vulnerability & Exploitation	Barnet Strategic Lead on Violence, Vulnerability & Exploitation - Key interlocutor & partner in reducing risk of violence and exploitation of young people.	10/05/2022 - MS Teams Meeting	NW BCU - Proactive DCI discussion with LA Strategic Lead for Violence re collaboration to reduce violence across Barnet LA - to be achieved through improved information sharing and joint resourcing/focus on violence hot spots and individuals linked to violence. Discussion and explanation of GVM to improve partner understanding of data-set and identify victims of potential criminal / CL exploitation. Resulting in agreement to share GVM with Barnet. Subsequently approved and shared through MO2 with confirmation by Data Office of ISA between MPS and Barnet LA.
Janice Noble: Head of Community Safety - Harrow LA	Head of Community Safety - Harrow LA.	10/05/2022 - Telephone Call / Face to Face	NW BCU - Proactive DCI discussion with LA Partner re collaboration to reduce violence across Harrow LA - This was a follow on from discussion with Barnet LA: to be achieved through improved information sharing and joint resourcing/focus on violence hot spots and individuals linked to violence. Discussion and explanation of GVM to improve partner understanding of data-set. Resulting in agreement to share GVM with partners.

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			Subsequently approved and shared through MO2 with confirmation by Data Office of ISA between MPS and Harrow LA.
Hackney Youth IAG	Approached by YIAG to present	29/06/2020	The GVM was discussed at the Hackney YIAG following a request from the group to have information around partner and police work re gangs. The main focus for the MPS on the GVM following various external interest in the Matrix. It was a useful and engaged meeting with several questions from IAG members relating to entry on the Matrix, the purpose and vulnerability side of gangs including county lines. The IAG were supportive of the use of the Matrix and understood why the MPS used the Matrix.
Hackney safeguarding adolescents panel	Approached by panel for information to present	12/05/2021	The GVM presentation was recalled from YIAG presentation and request for this to be made available for this meeting and further training into City & Hackney safeguarding children partnership employees, was confirmed (MO2) and provided. Figures from previous presentation redacted as no longer accurate. Signposting clearly identified. Well received and provided base for partners to be able to promote the ethos behind GVM positively – no negative views or further information requested.
National Parents Forum	Approached by forum to present around gangs and GVM	07/06/2021	Through promotion of IGU, forum requested police presence at panel to discuss gangs, prevention, diversion and also information re the GVM which was known about due to press but not clear. Presentation provided, demystified and questions answered. Positive response from community in relation to the actual use of GVM
LA safeguarding/community workers/probation/YOT/housing spoc/ DWP Spoc (as per IGU ISA)	ISA agreement re IGU's	Daily (briefing), bi-weekly GVM panel meeting, monthly Gangs Information Sharing and Tasking Meeting	Briefing/panel discussions re GVM nominals, engagement, diversions efforts, judicial activity etc. All partners/staff involved are aware of how the GVM works, implementation and use.

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<p>Hackney IAG Community Monitoring Group Tensions Monitoring Group</p>	<p>CI Jai Singh leads (SNT) CI Lucky Singh leads (SNT)</p>	<p>Monthly and in response to specific community tensions of incidents.</p>	<p>Focused on Stop and Search scrutiny/review, Section 60 review. Specific to rises in violence or community tensions. All sit monthly, none specifically or overtly reference the GVM however gangs, offending profile and history, violence and the policing and partnership response to these incidents are discussed</p>
<p>London Borough of Redbridge , Havering &amp; Barking &amp; Dagenham through the serious Gang violence monthly meeting</p>	<p>These monthly meetings include community members who work in the boroughs of Havering ,Redbridge, &amp; barking &amp; Dagenham</p>	<p>September 2019 – onwards Monthly meetings between partners and stakeholders to manage the concerns over young persons and subjects on the Gang matrix and emerging groups</p>	<p>The GVM was discussed at all three local authority meetings following a request from the group to have an update from the MPS on the GVM following various external interest in the Matrix. It was a useful and engaged meeting with several questions from members relating to entry on the Matrix, the purpose and vulnerability side of gangs including county lines. There has also been challenge conversations as to why certain nominals or Gangs not being recognised as a gang and therefore not been placed on the matrix Explanation of the criteria has led to greater understanding in respect of Redbridge local authority</p>
<p>Bromley LA SYV and gangs, YOS, CRC, NPS, DWP, St Giles, LA Community Safety Lead</p>	<p>Bromley Gangs Tasking Meeting Partnership plan for gang management (overall and individuals)</p>	<p>20/11/2019, 12/02/2020, 11/03/2020, 22/04/2021, 26/05/2021, 27/07/2021, 10/10/2021.</p>	<p>Discussion of specific gang members to establish joint risk management plan. Removals/Additions to GVM discussed and agreed No issues around the GVM or its management raised.</p>
<p>LA SYV and Gangs, IAG, YOS, VRN, BME, AST, Gateway, Learning Access, Saffron Valley</p>	<p>GMAT Key partners, both statutory and non-statutory, and community leaders provided with general gangs update and invited to give comment, raise concerns etc....</p>	<p>10/12/2019, 21/01/2020, 03/03/2020, 21/07/2020, 22/09/2020, 10/11/2020, 21/01/2021, 16/02/2021, 27/04/2021,</p>	<p>No concerns or issues raised in relation to the GVM or its management.</p>

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		08/06/2021, 20/07/2021	
Croydon/Bromley LA SYV and Gangs, YOS	Full GVM review for additions/removals. Sought consultation from partners to ensure continued joint approach to gang management.	26/07/2022	All persons on SN GVM and gang associates discussed to ascertain relevant intelligence existed to justify remaining on the matrix, or being added to the GVM. Those for whom the relevant intelligence did not exist were removed from the GVM. New members were added. All documented on Crimint.
LA SYV and Gangs, Legacy Youth Zone, Reaching Higher, Croydon Drop In, Palace for Life, SVC, PlayPlace, Gloves not Guns, BME, Saffron Valley, IAG	Community Gangs Forum Key partners, both statutory and non-statutory, and community leaders provided with general gangs update and invited to give comment, raise concerns.	03/08/2021, 07/09/2021, 07/12/2021, 15/03/2022, 12/07/2022, 21/09/2022.	No concerns or issues raised in relation to the GVM or its management.
Croydon LA SYV and Gangs, YOS	Croydon Gangs Tasking Meeting Partnership plan for gang management (overall and individuals)	Takes place weekly on a Tuesday	Discussion of specific gang members to establish joint risk management plan. Removals/Additions to GVM discussed and agreed No issues around the GVM or its management raised.
Richmond & Wandsworth Local Authority	Partnership approach dealing with violence on boroughs	28th February 2022 Email contact between Children's services and SW Gangs Unit	Access to GVM was raised in relation to KPIs and performance and improvement function within Children's Services, and having access to the GVM in order to do this. Consultation took place in relation to the ISA already in place with the council, and how access to the matrix could be facilitated in order to assist with this.
Richmond & Wandsworth Violence Group	Partnership approach dealing with violence on boroughs	25th August 2021	Set up of ISA with LA in order to share information in relation to those on the GVM to assist with enforcement/engagement opportunities.
Bexley holds POC (Persons of Concern) once a month, Panel members include SYV, Bexley CSU (Community Safety), Probation, RY council Exploitation Lead	N/A	Every 2nd Thursday of the month.	Individuals are added or removed from GVM with consultation with VSU Inspector and safeguarding joint work put in place.

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Lewisham holds SVY once a month, Panel members include SYV, Lewisham violence reduction team, Probation, PL council Exploitation Lead.	N/A	Every Wednesday of the month	Individuals are added or removed from GVM with consultation with VSU Inspector and safeguarding joint work put in place.
Greenwich holds GRASP once a month, Panel members include SYV, Greenwich CSU (Community Safety), Probation, RG council Exploitation Lead. Greenwich also holds 18-25 Meeting every week to pick up the older groups.	N/A	Every Wednesday of the month  Every Thursday of the month	Individuals are added or removed from GVM with consultation with VSU Inspector and safeguarding joint work put in place.

**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:

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

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

**GUIDANCE**

Potential positive / negative issues / impacts	Activity	Role Holder	Action By Date	Progress/Timescale/ Monitoring
The GVM has been used in the MPS for a number of years, going back to 2012. Since the inception of the Matrix, there have been many changes in both policing and how Gangs operate in London	The GVM is being reviewed and refreshed which will take in to account the differences in policing and Gangs since the Matrix was first designed. This includes more focus on gang members who have been victims of	Met Intelligence	Ongoing yearly reviews	GVM Task and Finish Group meeting



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	violence.			
Since the inception of the GVM there has been a large turn over in officers and staff using the Matrix, with understanding of the Matrix passed down rather than corporate training refreshed on a large scale.	As part of the review of the GVM corporate training has been conducted as well as communications on the Intranet to enhance knowledge across the MPS. Training was initially to local Basic Command Unit (BCU) Single point of Contacts (SPOCs) at Detective Superintendent (DSU) rank and Detective Inspector (DI) rank. Training was then undertaken for other officers and staff in BCUs who process data on the GVM. This training is mandatory before anyone is given modify access. Training is now being delivered out to BCUs to extend the number of officers and staff trained.	Met Intelligence	Ongoing yearly reviews	Initial training of all BCU SPOCs, deputies and editors is now complete. Training will be ongoing. BCUs to provide further training.
A number of officers and staff in the MPS have access to the GVM.	Access to the Matrix was stopped in April 2019 and started again. This enabled the MPS to have full understanding of who has access. To gain access officers and staff need to complete data protection training and complete a user access form which needs to be authorised by a Superintendent or equivalent. Those processing data on the GVM need additional training. An access log is maintained showing who has access, why they need access and what level access they have.	Met Intelligence	Ongoing yearly reviews	GVM Oversight Group MO5 – Met Compliance
Age / Race / Sex – Individuals on the GVM are more likely to be offered interventions and support from police and partners than those who are not on the Matrix	Individuals on the Matrix may be discussed at local partnership meetings where police and partners will consider a number of interventions to support these individuals and their families to move away from gangs.	BCU Detective Superintendent - lead for gangs	Ongoing yearly reviews	Local partnership meetings
A clear reporting and recording line from the MPS to affected communities, accounting for its consideration, decision making and action upon such feedback which will allow the MPS to address and comply with its PSED	A clear process needs to be put in place to allow for the recording of all feedback and concerns from the communities across London in relation to the GVM.	BCU GVM Leads	Ongoing	FLP GVM Coordinator

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: A large proportion of individuals on the GVM are young people with 70% 25 or under.	This is justified by statistics that show young people's involvement as victims and suspects of violent crime such as knife crime. Ongoing training and adherence to the on-boarding and exiting criteria set out in the GVM SOP must be maintained	MPS GVM lead BCU GVM Leads Met Intelligence – Detective Chief Superintendent (DCS)	Ongoing yearly reviews	GVM Oversight Group. MOPAC Review & Oversight. MOPAC Disproportionality Board.
Age: Young people are particularly known to be impacted by gangs via being recruited into gangs or exploited for criminal gains by gangs.	Work with external partners, including agencies with statutory responsibility for safeguarding, to explore and provide opportunities to remove and protect children from gangs and exploitation	VCTF BCU GVM Leads BCU Safeguarding Leads	Ongoing yearly reviews	GVM Oversight Group.
Age: Young people's involvement in gangs must not prevent the police and partners undertaking necessary enforcement against those participating in criminality and particularly violence, with the police having a duty of care towards victims, and potential victims, of crime.	Ensure that officers and staff are able to utilise criminal justice measures in order to protect the public and bring those involved in crime and in particular violence to justice.	BCU Safeguarding Leads	Ongoing yearly reviews	GVM Oversight Group.
Age: Concern around The MPS does not differentiate between adults and vulnerable children in its approach to gang-related crime. (Community Reference Group)	In the GVM Toolkit, there is a focus on children who find themselves on the Gangs Violence Matrix. This is identified that those under the age of 18 need to be treated differently to those over the age of 18. This is in accordance with Working Together 2018. Often it can be difficult to differentiate between children who are vulnerable or exploited and the resultant criminality. Diversion, partnership working and family	BCU Safeguarding Leads	Ongoing yearly reviews	GVM Oversight Group.

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	engagement is now at the heart of the tactics to ensure a holistic response is used in relation to children. Ensuring officers who work with this cohort have some training in contextual safeguarding and trauma informed practice. Children who have applied for refugee status or who have come into the UK from war torn countries may need additional support. The toolkit is reflective of this.			
Race: The GVM contains a disproportionate amount of subjects from ethnic minority backgrounds when compared with the population of London.	Ongoing training and adherence to the onboarding and exiting criteria set out in the GVM SOP must be maintained.	Met Intelligence – Detective Chief Superintendent (DCS)  BCU GVM Leads	Ongoing yearly reviews	GVM Task and Finish Group meeting / Trident IAG / Race IAG GVM Oversight Group. MOPAC Review & Oversight. MOPAC Disproportionality Board.
Race: The GVM categorises subjects based on criminal activity and intelligence. This allows for a tiered response in order to best target subjects who pose a risk to others, and themselves.	The GVM toolkit will support local Gangs leads with identifying activities to seek to reduce violence and support subjects in moving away from gangs.	FLP GVM Coordinator	Ongoing yearly reviews	GVM Oversight Group.
Race: Concern around the GVM being a discriminatory tool that disproportionately targets people from ethnic minority backgrounds, particularly young, black men. (MOPAC Community Reference Group / Amnesty / Stopwatch / various media articles)	There is clear criteria for the inclusion of subjects on the GVM, based on auditable intelligence. The population of the GVM is checked regular to ensure compliance to this criteria. The GVM focuses on gang-related crime, and specifically on serious violence. The MPS believes collection of this data is proportionate in fulfilling a primary policing duty to keep people safe. The GVM population reflects Police data and Accident and Emergency data, which indicates that young, African Caribbean men are disproportionately represented as offenders and victims of serious violence. The MPS is committed to working with MOPAC to understand the reasons for this disproportionality.	Met Intelligence – Detective Chief Superintendent (DCS) FLP GVM Coordinator	Ongoing yearly reviews	GVM Oversight Group.

**NOT PROTECTIVELY MARKED**

<p>Race: Concern around Social media, and music videos particularly, is being used as intelligence to evidence gang membership. (MOPAC Community Reference Group)</p>	<p>Social media and music are important in many people's everyday lives. The MPS recognises that many within the black community believe the police view certain music styles, particularly 'drill' music, as criminal in nature. The MPS does not take this position and has produced guidance and training to staff on social media and drill music videos that explicitly makes this clear. The guidance sets out clear criteria for what may support evidence of gang membership within social media and be suitable for inclusion on the GVM.</p>	<p>BCU GVM Leads</p>	<p>Ongoing yearly reviews</p>	<p>FLP GVM Coordinator</p>
<p>Sex – Males represent a much higher proportion of subjects on the Gangs Matrix.</p>	<p>This is justified by statistics that show a small number of females are victims and suspects of violent crime such as knife crime. There are also intelligence gaps on female's involvement in gangs. A review is to be completed of available support to females in gangs, understanding that strategies to target males may not be appropriate for female gang members. Some of this may form part of CSE or DA strategies. However, there are females on the Gangs Matrix and there must be responses tailored to support and, where appropriate, target them. This will include a number of local intervention programs, e.g. Abianda.</p>	<p>BCU Detective Superintendent - Safeguarding</p>	<p>Ongoing yearly reviews</p>	<p>Met Police Inclusion Forum(s) / Gang Crime Fighters meeting / Met Police Safeguarding Meeting</p>
<p>Age / Race / Sex – Individuals on the GVM are more likely to be offered interventions and support from police and partners than those who are not on the Matrix</p>	<p>Individuals on the Matrix may be discussed at local partnership meetings where police and partners will consider a number of interventions to support these individuals and their families to move away from gangs.</p>	<p>BCU Detective Superintendent - lead for gangs</p>	<p>Ongoing yearly reviews</p>	<p>Local partnership meetings</p>

**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?

Met Intel now has governance of the MPS GVM. The GVM Oversight meetings are currently taking place on a monthly basis chaired by the Director Of Intelligence. These are attended by a variety of key stakeholders from across the MPS. These will continue to take place to monitor compliance of the Matrix which includes making sure relevant individuals are on the Matrix, weeding, data protection and the equality act.

**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?

Monitoring will be done quarterly to ensure the action plans is met and any issues take forward to ensure compliance.

**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. The MPS GVM is also available for subject access and Freedom of Information Access Requests which regularly come into the MPS. All such requests are considered before a decision is made whether to release information as per guidelines.