



EQUALITY IMPACT ASSESSMENT (updated January 2024)

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	Violence Harm Assessment (VHA)					
Branch / OCU	MO2 - Met Intelligence					
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Author	DSU William Wright					

STAFF INFORMATION						GUIDANCE
Person Completing EIA	DSU William Wright					
Signed	<i>William Wright DSU</i>			Date	30/01/24	
Person Supervising EIA/SLT Approval	Lindsey Chiswick					
Signed	<i>L. J. Chiswick</i>			Date	31/01/24	
Quality Assurance Approval	Crime Prevention, Inclusion & Engagement (CPIE)					
Name	Halil Huseyin	Unit	CPIE	Date	13/11/2023	

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		
SLT OCU / BCU / Management Board endorsing decision						
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 Violence Harm Assessment (VHA) is a tool used to identify and risk assess individuals involved in violence in London. It is an internal MPS intelligence tool used to tackle the most harmful and violent offenders.

It measures the harm violent individuals pose by scoring individuals across London for violence and weapons offences and intelligence, and provides a single score that allows an assessment of the risks they pose.

By using the VHA the MPS will be able to prioritise, focus and direct resources to deal with individuals who pose the greatest risk of violence in London, however being on the VHA does not mandate or guarantee action against an individual

The VHA supports the MPS *New Met for London* plan.

New Met for London

Our mission is to deliver More Trust, Less Crime and High Standards. (New Met for London 2023 – 2025). To achieve this, the MPS will focus on three priorities:

- Community Crime Fighting
- Culture Change
- Fixing Our Foundations

The VHA supports this by allowing the MPS to:

- Take a precise and community-first approach to tackling and reducing serious violence;
- Providing the data and technology the MPS needs to be precise and reduce disproportionality in how we police London.

Some of the key benefits of the VHA are:

- It identifies high harm individuals in London and prioritises the current most violent individuals that pose the greatest risk of threat and harm;
- It allows comparisons to be made of individual high harm offenders across the MPS, which aids the prioritising of resource allocation, ownership of risk and methods of intervention;
- It highlights possible gaps in activity or intelligence on violent and high harm individuals.

The VHA is designed to be utilised by the Basic Command Units (BCUs) through the BCU Detective Superintendent – Lead for CID who will have oversight of the VHA individuals at a local level.

The VHA will be used as an intelligence tool within policing to prioritise and drive operational activity. If required, filtering can be carried out on the crime types scored to allow police resources to be prioritised depending on national or local priorities The VHA will not be shared with partner agencies.

If an individual is identified as requiring safeguarding or intervention through external partners, information on this person can be shared via common law or statutory police powers through existing Data Sharing Agreements (DSA) or in line with policing obligations including, for example, the obligations outlined in the statutory guidance 'Working Together to Safeguard Children'. This will allow the sharing of intelligence around these individuals where there are specific concerns. However, it is intelligence/information that is shared with partners not the fact that they are on the VHA.

The MPS recognise the value of information sharing in order to ensure individuals at risk are offered help, support or guidance to exit criminality via Community Safety Partnerships (CSPs) and third party organisations. Where regular meetings with partners take place and information relating to the VHA is shared, a DSA, if not already in place, will need to be considered and signed by the MPS and partners. In these circumstances it is only the intelligence/information that may be shared, not the fact an individual is on the VHA.

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**

The VHA is supported by a number of documents

VHA SOP:

The MPS VHA Standard Operating Policy (SOP) is available to all officers and staff within the MPS via the VHA intranet page.

The SOP outlines procedures for the VHA by,

- Setting out the training and awareness requirement
- Identifying Governance and Audit for the VHA
- Setting out Guidance and process for VHA users
- Setting out the roles and responsibilities of different units within the MPS
- Setting out how and under what circumstances intelligence from the VHA can be shared with partners.

To access the VHA officers need to complete data protection training and have signed authorisation from a Superintendent or police staff equivalent.

Auditing

Audits are completed in two ways; monthly system audits to review access to the VHA by users undertaken by MO2 Nominals and Central Tasking team; and physical audits in BCUs by MO5 Inspection and Review team.

Data Protection

A Data Protection Impact Assessment has been produced for the VHA.

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 system specific to the VHA. This mandates that the VHA is hosted on Box, which is a secure, auditable system with effective controls to restrict access. Only the most recent version of the VHA is accessible with the previous versions archived for three years and access limited to a small number of staff in the MO2 Intelligence Command.

Equality Impact Assessment & Public Sector Equality Duty

In April 2020 the MPS completed an Equality Impact Assessment (EIA) for the VHA. The EIA is a live document and develops iteratively based on feedback and learning.

In writing this EIA the MPS have drawn upon previous constructive conversations with numerous stakeholders and partners, particularly around the Gangs Violence Matrix (GVM) as well as bespoke engagement on the current VHA to build our understanding of the effect that the VHA would have on impacted groups.

This process and consultation have identified a number of areas where VHA policy and policing practice may directly or indirectly have adverse effect on impacted groups. Where possible the MPS have made changes to remove adverse effects. In other areas where we have felt our actions are proportionate to the threat we seek to mitigate we have tried to reduce adverse effects by implementing new controls. These changes are reflected in the revised SOP for the Violence Harm Assessment.

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 VHA 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.

Examples below identify issues falling under Public Sector Equality Duty raised to the MPS during consultation process on the VHA.

The three key protected characteristics identified which are impacted; age, race and sex. The other characteristics have not been identified as being impacted on from processing the VHA and therefore resources are prioritised in monitoring the key characteristics identified.

Age - The majority of individuals on the MPS VHA are young people with those aged under 25 making up 69% of the Assessment's cohort, including 450 (28%) who are under 18. Young people are also more likely to be suspects of violent crime particularly knife injury offences as well as robbery. 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 violence-related criminality. There are less interventions available to those over 25.

Race –Police data indicates that young, black men are disproportionately represented as offenders of serious violence. The VHA is reflective of this.

Sex - Males are disproportionately affected as high harm individuals. This is shown within the individuals on the Violence Harm Assessment with only 4% of the VHA being females.

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).

All consultation records are stored on the MO2 VHA Box Folder. This includes documents shared with MOPAC, Independent Advisory Groups (IAG), Partners and Community groups, summary of these meetings, Frequently Asked Questions (FAQs) and presentation briefing documents. Feedback Minutes and agendas from some of these IAG meetings (where they have been provided) and various emails relating to the consultation activity and any MPS response. To respect the wishes of individuals that have been consulted with we have not revealed their identities within this document.

Name of Business Group / Unit, Association, Stakeholder (External)	Why are you approaching them?	Date and method of planned consultation	Outcome of consultation
MOPAC	To inform MOPAC of change of focus for VHA especially in terms of prioritising activity against those on the VHA. Also provide oversight and updates on the ongoing process.	18/01/23 to present	Ongoing oversight of VHA.

NOT PROTECTIVELY MARKED

<p>Central Race Independent Advisory Group (IAG) meeting</p>	<p>To update the IAG on the options being considered by the MPS to conduct a wholesale review of the GVM</p>	<p>30/01/23 - MSTeams</p>	<p>Feedback towards the VHA was largely positive with us however the group wanted further time to consider the presentation. Committed to consulting further moving forward</p>
<p>Taskforce IAG meeting</p>	<p>To update the IAG on the options being considered by the MPS to conduct a wholesale review of the GVM</p>	<p>08/02/23 - MSTeams</p>	<p>Feedback provided was largely positive towards the VHA however wished to consider it in more depth, particularly as a number of its members could not attend</p>
<p>Area South - AS (Lambeth, Southwark) BCU led engagement.</p> <ul style="list-style-type: none"> • Member for Community Safety (Lambeth) • Community Safety (Lambeth) – Assistant Director • Lead Member for Community Safety (Southwark) • Community Safety (Southwark) - Assistant Director • Head of Service - Probation • IAG Chair (Southwark) 	<p>Elected members of the council and key stakeholders representing the interests of partners and the local community.</p>	<p>23/03/2023 and 26/03/2023 via MSTeams</p>	<p>Concerns/Issues raised</p> <ul style="list-style-type: none"> • Communication and marketing with community, more humility is required – not appropriate to say that the MPS has responded to feedback and decided to discontinue use of the GVM of its own volition. • Adulthood of children. • There is a risk with this that the VHA becomes overpopulated • how would VHA affect processes such as MAPPA/IOM? • What will be shared with us? <p>Positives</p> <ul style="list-style-type: none"> • Appreciated being engaged with on the VHA and have honest feedback relating to their concerns <p>Outcome</p> <ul style="list-style-type: none"> • Keen to hear an update on the questions asked, many of which could not be answered as they do not feature within the FAQ briefing pack <p>Suggestions</p> <ul style="list-style-type: none"> • Suggests that we should be building community relationships and speaking/involving community and

			<p>collecting their concerns whilst building and evolving the VHA</p> <p>Actions FAQs updated to reflect questions of the group.</p> <ul style="list-style-type: none"> • SOP and briefings updated to specifically address dealing with U18s on the VHA
<p>Central East - CE (Tower Hamlets, Hackney) BCU led engagement.</p> <ul style="list-style-type: none"> • Head of Community Safety - Tower Hamlets • Exploitation Lead - Tower Hamlets • Integrated Gangs Unit Manager – Hackney • Community Outreach Hackney 	<p>Key stakeholders representing the interests of partners and the local community.</p>	<p>05/06/2023</p>	<p>Concerns/Issues raised</p> <ul style="list-style-type: none"> • From Tower Hamlets there were some concerns raised about how this would affect processes such as MAPPA/IOM • Both Tower Hamlets and Hackney raised concerns around lack of inclusion of partner information/intel. <i>MPS Response at the time of the meeting</i> - Reassurance provided that we recognise the importance of partner information and that this is not the sole tool we will be using to task/deploy resources. • Hackney IGU raised more broad concerns on police lists and drew similarities to the GVM, with concerns about how it would be managed. <i>MPS Response at the time of the meeting</i> - Greater explanation with Hackney reps around differences between GVM and VHA, emphasised inclusion criteria for VHA and fact centrally managed, drew on differences between VHA and GVM. <p>Positives</p> <ul style="list-style-type: none"> • there would only be minor changes required to current Hackney IGU processes

			<ul style="list-style-type: none"> • Overall, Tower Hamlets Council are happy and would like to be kept abreast of timescale going forwards. • The importance of partnership working and sharing of information was recognised. <p>Outcome</p> <ul style="list-style-type: none"> • All attendees were happy with the presentation and would like to be kept abreast of timescale going forwards • More work will be required to bring practitioners from Hackney IGU on-board with this change, specifically around IGU police processes etc. <p>Suggestions</p> <ul style="list-style-type: none"> • Inclusion of any guidance around MAPPA <p>Actions FAQs updated to reflect questions of the group. SOP updated in relation to sharing information with partners</p>
<p>Central North - CN (Camden, Islington) BCU led engagement.</p> <ul style="list-style-type: none"> • Islington IAG, SNB and Head of Youth and Young People • Camden IAG & Community Safety 	<p>Key stakeholders representing the interests of partners and the local community.</p>	<p>In person briefings between the 16/05/2023 and 25/05/2023</p>	<p>Concerns/Issues raised</p> <ul style="list-style-type: none"> • May need wider consultation • This must be an absolute change in our approach. Not just a renaming of the GVM. Assurances were given that this was not the case. <p><i>*Note no response by the MPS to concerns and issues raised were captured for this meeting</i></p> <p>Actions</p> <p>Positives</p>

			<ul style="list-style-type: none"> • Feels like a more precise and intelligent led way of targeting nominals • Welcome that the GVM is being replaced by something less subjective and more focused on evidence and intel • Feeling that there is currently too much focus on gangs. There is an opinion that the MPS operates in a way that, if the offender is not in a gang then it's not seen as a priority. Again, the change to use the VHA will address this <p>Outcome</p> <ul style="list-style-type: none"> • Overall, there was great level of support and backing of the incoming VHA. <p>Suggestions</p> <ul style="list-style-type: none"> • More consultation needed going forward <p>Actions</p> <p>FAQs updated to reflect questions of the group.</p>
<p>East Area - EA (Havering, Redbridge) BCU led engagement.</p> <ul style="list-style-type: none"> • Barking and Dagenham Community Safety Partnership and Operations Law and Enforcement • Havering and Redbridge Community Safety Partnership. • Havering CMG and IAG, 	<p>Key stakeholders representing the interests of partners and the local community.</p>	<p>Between 30/05/2023 and 01/06/2023 via MSTeams</p>	<p>Concerns/Issues raised</p> <ul style="list-style-type: none"> • The VHA is 100% reactive and moves away from the Public Health approach in respect of prevention. • London Boroughs are in the process of completing their Strategic Needs Assessment and therefore need to know what their current borough looks like on the VHA. • What happens with Children? Different score? Do they revert to 0 when they reach 18?

- Havering Partners – Community Safety Intel Manager, Violence Reduction Analyst, Early Help Group Manager, Community Safety Manager, Children Services, Youth Justice Board, Council Tactical Analyst.

- Where does ownership of individuals sit in connection with areas such as MAPPA?
 - Main concern was regarding the scrutiny of the Assessment
 - Lacks an opportunity to identify subjects on the periphery where early intervention, engagement can take place.
 - The VHA needs something that runs alongside it to identify those at risk of becoming involved in violent activity.
 - There needs to be a list of associates as by the time people appear on the list engagement and diversion is often too late.
 - All parties raised the fact that there is no way of charting people's offending as they rise until they have already appeared as an accused or a suspect.
- *Note no response by the MPS to concerns and issues raised were captured for this meeting*

Actions

Positives

- Will focus activity on those that do not fall within the 'Gangs' definition.
- The outer boroughs welcome the change as it allows a focus on violent individuals, groups, not just those within Gangs.
- Welcome the change as it allows a focus on violent individuals, groups, via an academically approved method.
- Partners felt that the list was right and was needed, but partners surprised

			<p>that PWITS or GBH were not included.</p> <p>Outcome</p> <ul style="list-style-type: none"> • The VHA is a good step forward, but needs to run alongside a second list for associates of these individuals to allow the early intervention to take place. • VHA is welcomed but concerns around how to identify those outside of this list. • Partners felt the list and access in an operational context needs a lot more work. Yes the list works in allowing tasking, but does not support the vulnerability work at an early stage and does not work at an operational level. Feeling that there is still considerable work and engagement needed before any 'Go live' <p>Suggestions</p> <ul style="list-style-type: none"> • Vulnerability list to be created. • None, other than to keep regular updates • To include PWITS as this is a driver for violence and allows early identification of those individuals. <p>Action</p> <ul style="list-style-type: none"> • FAQs updated to reflect questions of the group. • SOP and briefings updated to specifically address dealing with U18s on the VHA.
<p>North Area - NA (Haringey) BCU led engagement.</p> <ul style="list-style-type: none"> • Haringey Independent 	<p>Key stakeholders representing the interests of partners and the local community.</p>	<p>In person on the 30/05/2023 and 25/05/2023</p>	<p>Concerns/Issues raised</p> <ul style="list-style-type: none"> • Interested in it and believed it was a better system <p>Positives</p>

<p>Advisory Group</p> <ul style="list-style-type: none"> • Haringey Council – Community Safety / ASB • Hope in Haringey • Hope engagement 			<ul style="list-style-type: none"> • Doesn't discriminate on any groups • Supportive and useful to know. • Useful to know, pleased with the MPS approach, that it wasn't subjective. • Like the engagement piece. <p>Outcome</p> <ul style="list-style-type: none"> • NA/ <p>Suggestions</p> <ul style="list-style-type: none"> • N/A
<p>North East Area - NE (Newham, Waltham Forest) BCU led engagement.</p> <ul style="list-style-type: none"> • London Borough of Newham, local Authority Community Safety • London Borough of Waltham Forest - Local Authority Community Safety 	<p>Key stakeholders representing the interests of partners</p>	<p>In person on the 12/05/2023 and 24/05/2023</p>	<p>Concerns/Issues raised</p> <ul style="list-style-type: none"> • Overall, very supportive but would like further information. Such as governance and ownership of VHA individuals. <p>Positives</p> <ul style="list-style-type: none"> • Opened dialogue that had previously been lacking. Further discussion to be had re potential integrated gangs unit. <p>Outcome</p> <ul style="list-style-type: none"> • N/A <p>Suggestions</p> <ul style="list-style-type: none"> • Follow up with further information that can be shared by means of a bespoke LA Briefing.
<p>South East Area - SE (Bexley) BCU led engagement</p> <ul style="list-style-type: none"> • Leader of Bexley Council • Cabinet member for Community Safety • Community Safety Manager 	<p>Key stakeholders representing the interests of partners and the local community.</p>	<p>In person on the 01/06/2023</p>	<p>Concerns/Issues raised</p> <ul style="list-style-type: none"> • asked about the demographic of identified individuals; <p><i>*Note no response by the MPS to concerns and issues raised were captured for this meeting</i></p> <p>Positives</p> <ul style="list-style-type: none"> • They understood the faults with the Gangs Matrix and that the VHA was an objective and therefore fairer system that would not unnecessarily capture

			<p>those who were on the margins of gang criminality but effectively victims</p> <p>Outcome</p> <ul style="list-style-type: none"> • N/A <p>Suggestions</p> <ul style="list-style-type: none"> • Asked for briefing to quarterly Community Safety Partnership Board Meeting
<p>South Area - SN (Bromley, Croydon) BCU led engagement</p> <ul style="list-style-type: none"> • IAG – ZD • London Borough of Bromley • Head of VRU SN 	<p>Key stakeholders representing the interests of partners and the local community.</p>	<p>11/03/2023 on MSTeams</p>	<p>Concerns/Issues raised</p> <ul style="list-style-type: none"> • Concerned with the impact on information sharing, especially with the over 18s. • Concerned about picking up prison releases for individuals linked to gang activity. • Concerned with capacity re wider information sharing. <p><i>*Note no response by the MPS to concerns and issues raised were captured for this meeting</i></p> <p>Actions</p> <ul style="list-style-type: none"> • N/A <p>Positives</p> <ul style="list-style-type: none"> • Understood the reason for the change, also understand that violence goes beyond gangs. Wants to understand how we capture daily stabbings etc. <p>Outcome</p> <ul style="list-style-type: none"> • Needs further meetings to sort out logistics going forward. <p>Suggestions</p> <ul style="list-style-type: none"> • N/A
<p>South West Area – SW- BCU led engagement</p>	<p>Key stakeholders representing the interests of partners and</p>	<p>01/06/2023 on MSTeams</p>	<p>Concerns/Issues raised</p> <ul style="list-style-type: none"> • Do different age groups have different

<ul style="list-style-type: none"> • Head of community safety for Merton • IAG Chair 	<p>the local community.</p>		<p>elements to consider? e.g under 18, is there consideration for vulnerability elements that could be a factor in them committing violent offences?</p> <p><i>*Note no response by the MPS to concerns and issues raised were captured for this meeting</i></p> <p>Positives</p> <ul style="list-style-type: none"> • Probably a good thing, too, that officers cannot manually adjust the scoring - however, where does this leave the introduction / recognition of 'local knowledge' • content with the idea that the VHA will focus on the most violent offenders - rather than 'scatter-gun' approach of 'just' gang members - also interested to see / learn what the 'academic assessment' looks like. • Welcomed the introduction of an evidence based approach and the move towards focusing on high harm offenders specifically. Also appreciated the personal contact and brief on the matter. <p>Outcome</p> <ul style="list-style-type: none"> • Stronger understanding of the VHA process and its focus on high harm, alongside some suggestions going forwards. Overall positive. <p>Suggestions</p> <ul style="list-style-type: none"> • Head of Community Safety was very keen that learning from the disproportionality of GVM were clearly highlighted by the new approach. • Finally that vulnerability is further
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			<p>considered as a factor across high harm offenders in the overall VHA assessment.</p> <ul style="list-style-type: none"> • That a review process involves partners and the opportunity to re-design based on progress, views and opportunities. <p>Action</p> <ul style="list-style-type: none"> • FAQs updated to reflect questions of the group. • SOP and briefings updated to specifically address dealing with U18s on the VHA
<p>North West Area - NW (Harrow, Brent) BCU led engagement.</p> <ul style="list-style-type: none"> • Harrow LA CST • Harrow LA Cabinet member for a safer communities and public protection • CSP Manager & CSP Lead - Brent LA • Brent LA Cabinet member for a safer communities and public protection • Brent LA - service manager for Child Safeguarding and Review 		<p>In person on the 24/05/2023 (Harrow) and MSTeams on the 26/05/2023 (Brent)</p>	<p>Concerns/Issues raised</p> <ul style="list-style-type: none"> • This is very mechanical needs some more nuance and consideration around sharing with the council. asking a specific request for each person is very difficult for the council <i>MPS response</i> - specific data requests is now needed due to data sharing and stopping people having access to the form and using the list for other purposes • What is the potential amount of increase or decrease in individuals that will now meet this threshold? <i>MPS response</i> - Partners were informed that the new system will look at how many times an individual is reported on CRIS and this process will mean that we are concentrating on violence offenders as opposed to those only linked to Gangs. • Is there any ages excluded from this list?

			<p><i>MPS response</i> - Information given that there is no age limit within VHA and it applies to both over and under 18s.</p> <ul style="list-style-type: none"> • When will you decide to share with partners? <i>MPS response</i>- Information will be shared with partners when necessary and as suggested (case by case basis). Partners were reassured VHA will not result in police and partners not working together. • Can we ask to be included in consultation around the practicalities that need to be considered for implementing this? <i>MPS response</i> - Partners were also informed that they will be kept updated once we submit their feedback and concerns raised during the meeting. • Those on the VHA, will they lose their Driving Licence? <i>MPS response</i> - Those on VHA will not lose their Driving Licence. <p>Positives</p> <ul style="list-style-type: none"> • Less Gang focussed and more focus on most violent offenders is really positive. <p>Outcome</p> <ul style="list-style-type: none"> • partners were aware of the issue have identified some other partners agencies that need to know what is happening and we will set up a secondary council meeting to discuss the proactive changes • Partners would like to be kept updated with further information around some
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			<p>aspects of VHA which we did not have information on.</p> <p>Suggestions</p> <ul style="list-style-type: none"> • For Partnership work there needs to be more engagement rather than saying what will happen deadlines for consultation are unrealistic for the council to get everyone around a table and there needs to be more lead time • Involve partners before this goes live within MPS <p>Action</p> <ul style="list-style-type: none"> • FAQ's updated to reflect questions of the group.
<p>North West Area - NW (Harrow, Brent) BCU led engagement.</p>	<p>Council partners who utilised the gangs matrix previously in Harrow</p>	<p>13/06/2023 via MSTeams</p>	<p>Concerns/Issues raised</p> <ul style="list-style-type: none"> • If people in the police are working with an individual how will the council know who the police are working with and who will make the decision on if the data is shared • This does not feel like its being done in line with the Casey review and does not feel like it is working alongside councils. • This will have an influence on the serious violence duty as the council needs to know its problem profile of the borough and violent individuals will play a part in that not sharing the list will not allow the council to react to things • there seems to be no value in this for the council and if the MPS are not sharing we may as well have our own list • there may be a duplication of efforts from the council if they are working on

			<p>someone and they don't know they are on the violence Assessment <i>MPS response – As per the FAQ's</i></p> <p>Positives</p> <ul style="list-style-type: none"> no positive feedback to this <p>Outcome</p> <ul style="list-style-type: none"> The overall view was that this was a worse system and that the consultation was pointless as the decision to move had already been made. there were considerable fears that going forward this would limit the councils ability to have shared goals towards which then could align themselves with the police <p>Suggestions</p> <ul style="list-style-type: none"> allow the council to see names on the list or provide an aggregated report with anonymised data that the council could work off such as demographics areas with high concentrations age groups and ethnicities but not names and addresses
<p>VHA External Engagement meeting by Met Intel – Including members from MOPAC GVM reference group.</p>	<p>Both previous members of the MOPAC led GVM reference group.</p>	<p>14/06/23 – In person.</p>	<p>Comments & Concerns/Issues raised</p> <ul style="list-style-type: none"> How many individuals per Borough? Will we really look at them all? How will partner intel be added in? Local community intelligence will no longer be factored in. Importance of use of plain language in all comms. What is the retention regime? Need to mitigate risk of someone finding way onto VHA who should not be. Need to consider how sharing with

			<p>partners, even on a case by case basis.</p> <p><i>*Note no response by the MPS to concerns and issues raised were captured for this meeting</i></p> <p>Actions FAQs updated to reflect questions of the group.</p>
<p>VHA External Engagement meeting by Met Intel – MO2 with members from MOPAC GVM reference group.</p>	<p>Members of the MOPAC led GVM reference group.</p>	<p>28/06/23 – In person.</p>	<p>Comments & Concerns/Issues raised</p> <ul style="list-style-type: none"> • How do you manage those “pulling the strings” of those who may be on the list but are being exploited? The community see the process as “bottom up” but want to know those at the top who may not feature on the VHA are being dealt with. Consider how you articulate this strategy. • Who is auditing the VHA? It might be worth considering having someone from the community. This could be seen as a preventative measure, and that a non LEA is assisting, and police are not just monitoring themselves. • In regard to disproportionality, need to identify how many BAME are in the list, following this new process, and actually identify if the issue is with society. • Consideration also to be given as to whether there is racial bias in how and what intel is provided. Need to ensure do not provide an “is what it is” type response. Try to qualify any perceived disproportionality. This response may also need community involvement as a societal situation.

			<ul style="list-style-type: none"> • See this new approach as a positive step. A crucial change is now focusing on individuals for their crime and not just due to a gang association. <p>Suggestions</p> <ul style="list-style-type: none"> ○ Discreet Management of info ○ Person focused ○ Regular auditing ○ Show points of engagement / oversight and who is conducting the oversight ○ Be both proactive and reactive within oversight ○ Require a clear credible message on how decommissioning the GVM, but making it clear that “gangs” are still being managed. <p>Actions</p> <ul style="list-style-type: none"> • FAQs updated to reflect questions of the group.
<p>NGO - No further details provided at request of organisation.</p>	<p>To provide feedback on the VHA</p>	<p>25/07/23 - MSTeams</p>	<ul style="list-style-type: none"> • Clarification requested on how scores are attributed • Rationale for Suspect over Convictions – possibility of disproportionality due to some communities / areas being “over policed” leading to greater reports. • Using “suspect” could risk racial disproportionality if wrongly named • Are there any statistics that could show if there is disproportionality on CRIS reports? • Has any work been carried out in

			<p>relation to the Crime reporting system?</p> <ul style="list-style-type: none"> • Mentioned the VHA has been running since 2020. Are there any data / characteristics held from that period? • How will you stop disproportionality • How does this differ to the matrix sharing process • Will the information on an individual be shared with the Home Office? • Helpful to see the breakdown of offence types • Can see the significant & fundamental differences • Who has been involved in the consultation process? • If an individual is not told they are on the VHA, how can they challenge under Article 8? What safeguards are in place? • It should not be a NCND response. Review case by case and allow for appeal • How will this help allocate resources? Does this not lead to geographical focus? • How will ethnicity be measured – how will you achieve aims • Is there PSED on each person on the VHA, similar to the GVM • Is there independent supervision / oversight <p>Action FAQs updated to reflect questions of the group.</p> <ul style="list-style-type: none"> • SOP and DPIA changed to reflect
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			there will not be a NCND stance for the VHA. Any RoAR will be reviewed on a case by case basis
NGOs - No further details provided at request of organisation	To provide feedback on the VHA	15/09/23 – In person	<ul style="list-style-type: none"> Concerns raised over the inclusion criteria of knife possession Suggestion there needs to be a tracking record of where information sent and advising when an individual has been removed from the VHA Safeguarding – how is this going to work with the VHA? Rational for Suspect over Convictions – possibility of disproportionality due to some communities / areas being “over policed” leading to greater reports.

STEP 5b. EIA Action Plan

From your consultation activities and available information explain within the appropriate Action Plan template the potential positive and / or negative impact of the proposal / policy, internally on members of your workforce and externally on your communities / service delivery:

Age	GUIDANCE	Race	GUIDANCE
Deaf and disabled / Disability	GUIDANCE	Religion 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	Progress/Timescale/

			Date	Monitoring

STEP 5d. EIA Action Plan Template Service Delivery Impacts (External)				GUIDANCE
Potential positive / negative issues / impacts	Activity	Role Holder	Action By Date	Progress/Timescale/ Monitoring
<p>Age: A large proportion of individuals on the VHA are young people with 69% under 25. There are children as young as 13 on the VHA. Statistics that show young people’s involvement as victims and suspects of violent crime such as knife crime.</p> <p>Statistics that show number of violent crime types also show disproportionate number of individuals under the age of 25 as suspects. These include 53% of suspects for knife related assaults, 51% of suspects for Lethal Barrelled firearm offences and 77% of suspects for robbery offence, were under 25 years</p>	<p>MO2 will continue to monitor these figures and are in discussions with MOPAC and to how VHA will be reviewed.</p>	<p>MO2 / MOPAC</p>		<p>Work is on going to create an awareness campaign to engaged and inform young people around the VHA</p>

NOT PROTECTIVELY MARKED

old, (Data from the 7 month period Jan 23 – July 23)				
<p>Age: Young people’s involvement in violence 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 as well as those who are U18 who are committing these crimes.</p>	<p>Work with external partners, including agencies with statutory responsibility for safeguarding, to explore and provide opportunities to remove and protect children who feature on the VHA or who are impacted by those on the VHA. Additional support for these young people at an early age may enable them to remove away from a criminal lifestyle and prevent them becoming victims or suspects of violence in the coming years.</p>	<p>BCU Detective Superintendent - lead for CID</p>	<p>Ongoing</p>	
<p>Age: Concern around The MPS does not differentiate between adults and vulnerable children in its approach to violent crime which potentially could lead to the adultification of children on the VHA.</p>	<p>Those under the age of 18 on the VHA need to be subject to additional considerations to those over the age of 18. This is in accordance with Working Together 2018 as well as current MPS policy’s in relation to U18 who come to police notice particularly in relation to those who come to notice as being involved in violent criminality. Often it can be difficult to differentiate between children who are vulnerable, exploited and the resultant criminality however any activity conducted around that child must seek to mitigate any identified risk to the child in addition to any enforcement activity. When appropriate, diversion partnership working and family engagement should be considered to ensure a holistic response is used in relation to children.</p>	<p>BCU Detective Superintendent - lead for CID MO2 VHA Lead</p>	<p>Oct 2023</p>	<p>VHA SOP updated to give guidance in relation to safeguarding obligations and options in relation to those individuals U18 who are on the VHA.</p>
<p>Race – 65% of the individuals on the VHA are subjects from different ethnic</p>	<p>The breakdown of special category information for those featuring on the</p>	<p>MO2 / MOPAC</p>		<p>Ongoing</p>

<p>minority backgrounds. Statistics that show number of violent crime types also show disproportionate number of individuals from different ethnic minority backgrounds as suspects. These include 58% of suspects for knife related assaults, 54% of suspects for Lethal Barrelled firearm offences and 65% of suspects for robbery offence, were from different ethnic minority backgrounds, (Data from the 7 month period Jan 23 – July 23)</p>	<p>VHA will be released on the MPS VHA website each quarter and the MPS will monitor these breakdown figures. In addition MOPAC will review disproportionality on the VHA</p>			
<p>Race - The Violence Harm Assessment categorises subjects based on criminal activity and intelligence. This allows operational activity to be focused on those individual who pose the most significant risk.</p>	<p>Local BCU leads, supervisors and officers have access to a number of approved policing tools which will support them in identifying activities to seek to reduce violence and support subjects in moving away from violence.</p>	<p>BCU Detective Superintendent - lead for CID</p>		
<p>Sex – Males represent a much higher proportion of subjects on the Violence Harm Assessment.</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 females on the VHA and there must be responses tailored to support and, where appropriate, prioritise them.</p>	<p>BCU Detective Superintendent - lead for CID</p>		
<p>Sex, Age, Race – MPS Decision not to share VHA with partners may impact on their ability to offer diversionary activity to individuals on the VHA.</p>	<p>The VHA focuses on the highest harm offenders who are already involved in criminality and therefore the majority of activity against individuals on it is expected to be enforcement based. The VHA can still be shared on a case by case basis and where diversionary activity is appropriate. The MPS will seek to monitor enforcement and diversion activity which takes place as a result of the VHA.</p>	<p>BCU Detective Superintendent - lead for CID</p>		

NOT PROTECTIVELY MARKED

<p>Sex, Age, Race – How will disproportionality be monitored and overseen</p>	<p>The MPS will publish data in relation to VHA which will provide a high level breakdown of the characteristics of individuals on the VHA. In addition the MPS will incorporate learning from the GVM in relation to disproportionality issue and apply this to the VHA. This will include continuing to work with MOPAC to ensure oversight of the VHA. The VHA will be subject of review at the Disproportionality Board chaired by the Deputy Mayor for Policing & Crime and the Deputy Mayor for Communities & Social.</p>	<p>MO2 – Director of Intelligence /DAC intelligence, MOPAC.</p>		
<p>As result of BCU consultation concerns raised that individual could remain on the VHA for a significant period of time when their offending had stopped.</p>	<p>Review inclusion criteria with regard to recency of offending</p>	<p>MO2</p>		<p>As a result of the review the inclusion criteria was changed to individuals having to have offended in the last 12 months unless in custody.</p>
<p>As result of consultation with NGO concerns raised around MPS decision to adopt a Neither Confirm Nor Deny status for individuals on the VHA.</p>	<p>Review NCND status</p>	<p>Director of Intelligence</p>		<p>All Rights of Access Requests will be considered on case by case basis.</p>
<p>As result of BCU consultation concerns raised that PWITS should inclusion criteria</p>	<p>Review inclusion criteria to include PWIT's offences</p>	<p>MO2</p>		<p>The addition of PWITS would result in an additional 300 plus individuals added to the list. Upon review it was decided that PWITS was a causal factor for violence but should not be used to prioritise violent offenders.</p>

NOT PROTECTIVELY MARKED

<p>As result of BCU consultation concerns raised that domestic related offences should inclusion criteria</p>	<p>Review inclusion criteria to include Domestic offences</p>	<p>MO2</p>		<p>The VHA seeks to prioritise open space offences and therefore does not include domestic related offence. In addition domestic related offences are captured on the VAWG 100 list.</p>
<p>As result of consultation it was asked what safeguards in place to ensure that a person who is identified should not be on the VHA can be raised and removed from the Assessment.</p>	<p>Review VHA SOP to ascertain if this was included in document</p>	<p>MO2</p>		<p>SOP updated to provide instruction to all staff and officers on how to raise an individual on the VHA who should be removed.</p>
<p>The use of suspect data on the VHA causes disproportionality due to the rational that some communities / areas being “over policed” which leads to a greater number of crime reports being generated.</p>	<p>During the consultation phase it was question whether the use of suspect data on the VHA could be replaced by either convicted or accused data.</p>	<p>MO2</p>	<p>Oct 2023</p>	<p>Based on feedback from a small number of stakeholders who were critical of our use of suspect data in the VHA, we modelled the VHA using accused data to see what difference it made and whether it was still a viable tool. Having done this, we now know that this would lead to the significant loss of a number of individuals who are assessed to be active and relevant to the VHA.</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?

The MPS Director of Intelligence/DAC Intelligence is responsible for the governance and oversight of the Violence Harm Assessment data. The strategic governance of operational use of the VHA is at Commander Level – FLP. Going forwards once the VHA is launched across all BCUs, the governance will be managed through two main meetings:

Quarterly VHA Strategic Oversight Group (Chair Director Intelligence) – Manages overarching governance, oversight and monitors any emerging disproportionality.

Monthly Strategic Tasking (Chair DAC Tasking) – Manages the operationalisation of the VHA.

This is in addition to local BCU Tasking meetings.

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 plan 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 published on the MPS VHA external webpage.

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>		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> N	
<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>		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> 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>		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> 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>		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> 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>		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
<i>Has the /LRO listed all equality impact identified via their collation and evaluation of data/information and/or consultation activities?</i>		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
<i>Has the LRO effectively demonstrated taking proportionate and necessary steps to eliminate and/or reduce all identified negative equality impact?</i>		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> 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>		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> 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>		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Line Managers Recommendations:				
<p>This EIA will need to be kept under review. This will be discussed at the quarterly VHA meeting chaired by Director Intelligence.</p>				
Supervisor Name Rank/Band:	Lindsey Chiswick, Director	Date Completed:		31/01/24

STEP 8B: SENIOR RESPONSIBLE OFFICER (SRO) DECISION MAKING			
<i>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).</i>			
Reject the Policy / Proposal	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Implement the Policy / Proposal	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Produce an alternate Policy / Proposal (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	01/04/20	
SRO Recommendations:			
<p>I have reviewed the EIA and been personally involved in some of the consultation sessions. The work has come a long way over the last 12 months and, as set out in the EIA, some of the decisions we have made are directly informed by the feedback we received. The EIA will be kept under review, in line with obligations under the Public Sector Equality Duty. This will be monitored under the quarterly VHA Strategic Board.</p>			
SRO Name Rank/Grade:	Lindsey Chiswick, Director	Date Completed:	31 January 2024

Retention period: 7 years