

Review of the Metropolitan Police Service Gangs Violence Matrix: Update on the implementation of the MOPAC recommendations

The Metropolitan Police Service (MPS) Gangs Violence Matrix (GVM) was developed in the aftermath of the 2011 London riots and is a tool used to identify and risk-assess the most harmful gang members in a Borough. From inception, the GVM has been controversial, and a number of in-depth reviews have been conducted, focusing on issues such as disproportionality and data protection. The Mayor of London, Sadiq Khan, made a commitment to Londoners in his 2016 manifesto and his Police and Crime Plan 2017-21 to conduct a review of the GVM. This Review was published in December 2018.

The Review, the most comprehensive ever conducted into the GVM, combined analysis of those on the Matrix, interviews with practitioners and those in communities affected by the Matrix, and detailed discussions with a Reference Group of practitioners and subject matter experts.

The Review recommended a comprehensive overhaul of the Matrix Operating Model both to restore trust in the Matrix and to bring it into line with data protection legislation. 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 that the representation of young, black males on the Matrix was disproportionate to their likelihood of criminality and victimisation and recognised that some of London's communities remain concerned about how the Matrix operates.

The Review made nine recommendations. By implementing these, our expectation was that transparency and accountability would increase, and that the Matrix would be more likely to be seen by Londoners as an effective and fair tool for reducing violence. The MPS had until 31st December 2019 to complete their recommendations. The following document looks at each recommendation and describes the action taken by the MPS to comply.

The MOPAC Review also took note of an investigation by the Information Commissioner's Office (ICO) into how Matrix data was used. This investigation found data breaches to have occurred and issued the MPS with an Enforcement Notice in November 2018. The Enforcement Notice required the MPS to improve practices around data storage, security, and sharing. 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.

MOPAC Recommendations

Recommendation One:

We recommend that the MPS comprehensively overhaul the Matrix Operating Model and review the Model annually. We further recommend that all officers using the Model receive training on how to apply the guidance and to do so consistently across all boroughs. Both the Operating Model and the training should have a particular focus on ensuring:

- that the right people are on the Matrix;
- that people are added and removed in a standardised, evidence-based manner;
- that they can be removed and that the 'gang' label will not 'follow' them;
- that local Matrices are refreshed regularly so that individuals don't stay on any longer than necessary;
- that the guidance on the use of social media for intelligence purposes is updated; and
- that the data protection principles and legislation are fully applied.

Action taken:

A new Standard Operating Procedure (SOP) and policy document have been produced for the Gangs Violence Matrix (GVM). The SOP and policy set out the operation and governance of the GVM, both centrally for the MPS Intelligence Command (Met Intelligence) who have overall control of the Matrix, and at Basic Command Unit (BCU) level.¹

In each BCU, officers who work with the Matrix have received training specific and relevant to their role. Each BCU now has a Detective Superintendent - a senior officer in charge of all dedicated crime investigation roles – who is designated as the Matrix *Single Point of Contact* (SPOC) for that BCU. SPOCs have been trained on their responsibilities to make sure that officers at lower ranks are using the Matrix fairly and following procedure.

Officers working in a dedicated team within a BCU to tackle violent crime linked to gangs have been trained on their responsibilities for adding and removing individuals from the Matrix, such as checking that information linking them to a gang is current, and updating the Matrix if this is known to have changed. Other officers have been trained on the changes made to the Matrix following the MOPAC recommendations; importantly the need to check Matrix status before making any decisions based on it, due to individuals being removed on a regular basis.

¹ The MPS Intelligence Command is a central department of the Metropolitan Police who have ownership of the Matrix and have worked to implement many of the recommendations. The local, day-to-day policing of London's boroughs falls to 12 Basic Command Units (BCUs).

Auditing of the Matrix has also been improved following the recommendations, and the MPS has a department that conducts audit reviews of the GVM on behalf of Met Intelligence and BCU leads. These audits are 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 which speaks to local officers and staff involved in the processing of GVM data, including all *Single Points of Contact* (SPOCs), their deputies, and officers editing the Matrix.

System audits take place on a monthly basis. Findings are provided to Met Intelligence showing how many people have accessed the Pan-London version of the Matrix and each local Matrix, and what they have done with the data (viewed, downloaded, or edited).

All users of the GVM are audited at least every six months. If users haven't viewed the GVM in this time period, their access is revoked. An audit form is sent to relevant users asking why they opened the GVM on specific date and time. Users may be asked to provide evidence of why a certain record was viewed and may have to provide a way in which this could be verified, such as by linking to a policing operation, or a senior officer who can confirm that viewing that record was required in the course of the officer's duty.

Recommendation Two:

We recommend 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. This reappraisal should begin as soon as possible and be concluded no later than 31st December 2019.

This reappraisal should consider whether: the level of risk they present justifies their continued inclusion; their inclusion is consistent with the published purpose of the Matrix; and whether their inclusion is compatible with Article 8 (2) of the Human Rights Act 1998. Where an individual does not meet these criteria, they should be removed from the Matrix.

Action taken:

All those who had a 'harm score' which gave them a Green grading on the Matrix were reviewed. This work was completed in Summer 2019 and resulted in 488 individuals being removed from the GVM where there was no longer current information which linked them to gang activity. This work also resulted in gang membership being newly evidenced for a large number of nominals on the GVM who were in the Green category, ensuring that auditable evidence of gang activity existed for those Green nominals who were kept on the Matrix. This was an area of focus for the original review and more information on this can be found [here](#) on pages 26 and 27).

Following this review and as part of current operating procedure and policy, BCUs are expected to review their GVM cohorts at least every quarter, with a particular focus on the Green category and those with 'zero harm' scores. Oversight of these reviews is conducted as part of the audit inspection and review process covered under Recommendation One, with the need for quarterly reviews featuring as part of training delivered to local BCUs.

Recommendation Three:

That MOPAC and the MPS engage with the Equality and Human Rights Commission as we deliver the recommendations in this Review and the ongoing work of the Gangs Matrix, supporting the MPS' work to further assess issues around human rights, disproportionality and produce an Equalities Impact Assessment.

Action taken:

The Equality and Human Rights Commission (EHRC) were contacted by MOPAC in early 2019. The EHRC explained that as they are the regulatory body for matters relating to equalities and human rights, it was essential that they retained neutrality and impartiality. For example, if a situation arose at a later stage in which the EHRC were required to assess and take action against the MPS in relation to the GVM, the EHRC would not be able to approach this with impartiality if they had previously provided advice to the MPS.

Following this, alternative arrangements were sought which would provide the Mayor and Londoners with full confidence that the Equalities Impact Assessment (EIA) completed by the MPS^[1] considers how the Matrix could affect Londoners with protected characteristics.

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 throughout the process of implementing the recommendations. This identified learning that the MPS is keen to consider and adopt where service improvements can be made. Terms of Reference have been written which set out how the MPS will revise current GVM arrangements. This includes 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. The MPS is committed to meeting its continuing statutory Public Sector Equality Duty in the application and operation of the Gangs Violence Matrix.

The actions from this Terms of Reference will support the formulation of ongoing review and engagement activity and will ensure that feedback is captured in an auditable way to

^[1] <https://www.met.police.uk/SysSiteAssets/media/downloads/force-content/met/about-us/gangs-violence-matrix/equality-impact-assessment-relating-to-gangs-violence-matrix.pdf>

enable future review and assessment of the views of communities and the MPS' actions. MOPAC will review the Terms of Reference at a new Disproportionality Board which will be led by the Deputy Mayor for Policing and Crime.

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.

MOPAC will track and closely scrutinise activity by the MPS in this area through a newly-formed board which will focus on issues of disproportionality, reporting in to the Mayor's London Crime Reduction Board. This will ensure that the MPS are considering a wide scope of information in their decision-making processes and draw from the experiences of Londoners, those working with young people, and MPS officers with expertise in engagement, equality, and inclusion.

Recommendation Four:

We recommend that the MPS strengthen their governance of the Matrix and the officers and partners that use it, creating single points of responsibility on each Borough Command Unit to:

- ensure there is no discriminatory practice;
- ensure that risks around data breaches are properly assessed and mitigated;
- track progress against recommendations published in this report;
- review the intelligence processes and flows that create organisational knowledge around gangs;
- assess the Matrix in the light of technological advances to future proof it;
- oversee the continuation and expansion of regular borough audits; and
- work with MOPAC to conduct new analysis exploring issues relating to disproportionality and the Matrix (e.g. micro-level demographics analysis in gang affected areas).

Action taken:

Strategic governance of the GVM sits with the Metropolitan Police Commander in charge of the MPS Intelligence Command. The Intelligence Command have ownership of the policy which sets out how the GVM will be used and sets the standards for how the GVM is managed in the Basic Command Units across London.

All twelve BCUs have an officer at the rank of Detective Superintendent who is the dedicated *Single Point of Contact* (SPOC) and has responsibility for the operation of the GVM on their BCU. When a new officer requires access to the GVM, such as if they transfer onto a team dedicated to tackling gang violence in a BCU, only the SPOC can grant them

access to the GVM, and access will only be granted once the SPOC is satisfied that the required training on data protection and rules for working with the GVM have been completed.

As mentioned in Recommendation One, the MPS has a full audit process implemented for the GVM which looks both at how BCUs are operating overall and how individual officers are using the Matrix.

Recommendation Five:

That the MPS improves systematic data capture across all aspects of the Matrix process. To include but not limited to:

- demographics of Matrix individuals (gender, age and ethnicity);
- nature and extent of police activity for those on the Matrix; and
- nature and extent of non-enforcement interventions (needs, referrals, uptake and outcomes).

We further recommend that MOPAC and the MPS conduct an annual review of the Matrix population, in comparison with the wider London gang and violent offending profiles. MOPAC will also convene partners to discuss options for enabling better collection of data on the impact of non-criminal justice interventions.

Action taken:

Gender, age and ethnicity were all captured on the Matrix previously. Following the recommendation, disability is also now recorded. Data on stops and arrests of those on the GVM is produced as part of an automated process.

Recording of non-policing interventions is important as it helps professionals to understand the most effective ways of helping to support people from leaving the exploitation of gangs. The MPS are able to record details of non-policing interventions offered to those on the Matrix, such as referral to support organisations; however, this is an interim arrangement and recording will improve when the MPS transition to a new IT system with a case management function from 2021.

In the meantime, a pilot to record interventions offered to those on the GVM went live in September 2020 in Central North BCU (Camden and Islington) and Central South BCU (Lambeth and Southwark). This pilot will run for three months and findings will then be reviewed. Consideration will be given as to how local authorities can support this work as part of the review following the pilot. Data collected on interventions will be shared with MOPAC's Evidence and Insight unit to establish any learning that can be shared across the MPS.

Further to the recommendation above, MOPAC's Evidence & Insight team has produced the first 'one-year update' document which examines additions and removals from the Matrix following the publication of the Matrix Review, examining data up to October 2019. This report is published at the same time as this update paper.

Recommendation Six:

We recommend that 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, with particular reference to:

- ensuring compliance with data protection principles and legislation, including the completion of a Data Protection Impact Assessment;
- who the Matrix information is shared with outside of the MPS;
- that any sharing of personal information is necessary and proportionate; and
- implementing recommendations set out in the ICO enforcement notice.

Action taken:

The GVM is now hosted on a secure system - Box - which has effective controls to restrict access. The system also logs when users have accessed the GVM, with this subject to regular audit. The system ensures that only the current version of the GVM is available for officers to view. Previous versions of the Matrix are archived with access limited to a small number of staff in the Intelligence Command, and after four years this information is deleted.

BCUs have a schedule in place for reviewing their local Matrix lists quarterly to make sure that information to evidence gang association and violence is still recent and within guidelines, with MPS Intelligence Command sending messages to BCU administrators ahead of this and requesting information on the number of individuals removed as a result of the local reviews.

A Data Protection Impact Assessment (DPIA) for the GVM is published on the MPS website² and is regularly reviewed and updated when necessary.

A vital aspect of supporting young people to access pathways away from exploitation and violence is ensuring that there is support in place to help them in overcoming issues which may have made them vulnerable to gangs. This support is often provided by organisations other than the Metropolitan Police Service. For this reason, it is important that information on individuals on the Matrix can be shared in these circumstances, but only with the

² <https://www.met.police.uk/SysSiteAssets/media/downloads/force-content/met/about-us/gangs-violence-matrix/data-protection-impact-assessment-2018-mps-gang-violence-matrix.pdf>

organisations that need to know it. This information could also be needed to assess risk when someone is released from prison.

After the Information Commissioner's Office issued the MPS with an Enforcement Notice in November 2018, the MPS stopped sharing lists of people who were on the Matrix. This was done to ensure that personal information was not shared with any organisation that did not need to know it. In situations when there was a need to share an individual's information with one or more agencies to protect that individual or another person, the MPS still had provisions in law which enabled them to do this.

Work was carried out by the MPS over 2019 to complete a Data Sharing Agreement (DSA), a document which sets out which agencies, such as local authorities, can receive information relating to the Matrix. This needed to be agreed and signed by each agency who would make use of Matrix information, so needed to consider the different reasons Matrix information might be required. Data Sharing Agreements were agreed with *Her Majesty's Prisons and Probation Service* (HMPPS), which includes the *National Probation Service*, and the MPS are now sharing the GVM with colleagues within HMPPS.

Work was also carried out with the local authorities for London's 32 boroughs to ensure that their requirements were included in Data Sharing Agreements. These were sent to the local authorities in December 2019. Thus far, twelve London boroughs have signed the DSAs and sharing has started in these locations. This remains an ongoing activity and the MPS continues to work with local authorities to get all DSAs signed.

In order to gain access, partners need to complete a user access form which sets out the conditions of use. The MPS control access by limiting partners to a 'preview-only' mode. This prevents non-police employees from downloading Matrix data in another format.

In boroughs where the Data Sharing Agreement has not been agreed, the MPS position remains that data will not be shared until the DSA is in place. Sharing of information in relation to specific individuals can still take place where necessary through other legislation, such as for safeguarding.

Recommendation Seven:

We recommend that the MPS improve transparency by producing, by the end of February 2019, publicly available plain English accessible information that:

- answers frequently asked questions about how the Matrix works and its purpose;
- sets out the governance and oversight mechanisms the Matrix is subject to;
- explains the training officers receive that helps them implement the Operating Model;

- describes the practical effect for an individual of being on the Matrix;
- clarifies how information is shared and who with;
- explains how an individual is added to and removed from the Matrix;
- describes how the multi-agency process works; and
- describes the relationship between the Matrix and the response to serious organised crime.

Action taken:

The MPS Gangs Violence Matrix website³ went live in February 2019. This hosts key documents including the Data Protection Impact Assessment (DPIA), the legal mandate for using the GVM and information explaining why the MPS use the Matrix and how it works. A list of frequently asked questions (FAQs) was added to the website in November 2019, and the content of the website has developed when it has been identified that additional information would help to improve understanding of the Matrix and related policing activity.

Recommendation Eight:

MOPAC will oversee implementation of the recommendations in this Review - and transparency in this work - by:

- requiring the MPS to report annually on progress against recommendations to the MPS Ethics and Audit panels and publishing those reports; and
- ensuring progress against recommendations are reported to the MOPAC / MPS Oversight Board.

Action taken:

A Gangs Matrix Oversight Group was established in March 2019 to monitor progress in implementing the recommendations. The group comprised of officers and staff from the MPS Intelligence Command with responsibility for overhauling the Matrix, and officers and senior members of the Mayor's Office for Policing and Crime (MOPAC), with the Deputy Mayor for Policing and Crime taking over as joint chair of the group from the third meeting onwards.

The MPS produced reports as required for two existing boards, the joint MPS and MOPAC Oversight Board, and the joint Audit Board. The report to Audit Board can be viewed [here](#) and the report to Oversight Board is published [here](#).

Following the conclusion of the period for implementing the recommendations, consideration has been given by the Mayor to how ongoing monitoring can take place to

³ <https://www.met.police.uk/police-forces/metropolitan-police/areas/about-us/about-the-met/gangs-violence-matrix/>

ensure that the MPS maintains the progress made against the recommendations, and continues to develop work on the Gangs Violence Matrix in the spirit of fairness and transparency as set out in the Review. Robust oversight of the Matrix will be incorporated into a new board to monitor disproportionality which is being created as part of the Mayor's [Action Plan for Transparency, Accountability and Trust in Policing](#), and which will report in to the London Crime Reduction Board, chaired by the Mayor. The June Disproportionality Board - co-chaired by the Deputy Mayor for Policing and Crime and the Deputy Mayor for Communities - will review the second annual review of Matrix population, looking at how the population has changed in terms of size, demographics and harm in the period since the Mayoral Review was conducted.

Recommendation Nine:

The MPS should consider whether the lessons learned from this review are applicable to the operation of, and sharing of information under, other operational tools.

Action taken:

The Gangs Violence Matrix is an operational policing tool, used to prioritise resources on those with the highest risk of causing harm, and supporting people in escaping exploitation by gangs. This basic concept – collating and using data about individuals known to be involved in criminality or at risk of doing so, is deemed by the police to be a fundamental part of policing and public safety, whether that be a large-scale tool such as the Police National Computer (PNC), down to small-scale, local measures such as the Gangs Violence Matrix.

The Information Commissioner's Office (ICO) issued the Enforcement Notice against the MPS in relation to the Gangs Violence Matrix, and the MPS had to carry out significant work on data sharing and storage practices to meet the ICO requirements. This led to the ICO discharging the Enforcement Notice. The principles behind these improvements, and the recommendations in the review of the Gangs Violence Matrix, extend to other operational tools held by the MPS.

An MPS Data Strategy has been produced and delivery of this will be taken forward by the MPS Data Office, which has ownership of data compliance and assurance. Met Intelligence run Information Assurance meetings to make sure that there is compliance across the datasets held by the Met Intelligence Command Unit and use lessons learned from the Gang Violence Matrix work to assist with this.

The ICO published a checklist for processing information⁴ in 2019 which Met Intelligence are using as a guide around data protection compliance for a number of key datasets.

Key parts of the action plan are to ensure that for each data set:

- Data is stored in a secure location (MPS Box system);
- A Data Protection Impact Assessment (DPIA) is in place;
- Sharing is only to occur with partners outside of Law Enforcement Agencies if a Data Sharing Agreement is in place;
- Access logs are in place;
- There is a relevant policy document in place for users; and
- There is a specific data selection and retention policy.

Met Intelligence are enforcing compliance around data protection training across the OCU, and access to many operational tools is only available if this training has been completed.

⁴ <https://ico.org.uk/for-organisations/in-your-sector/police-justice/processing-gangs-information-a-checklist-for-police-forces/>