

JOINT RESPONSE TO CONSULTATION ON DRAFT STATUTORY GUIDANCE TO SERIOUS VIOLENCE DUTY

SEPTEMBER 2022

INTRODUCTION

1. Our organisations from across the human rights, privacy and technology, criminal justice, violence against women and girls, and racial justice sectors welcome the opportunity to respond to the Home Office’s consultation on the Serious Violence Duty draft guidance for responsible authorities, issued by the Secretary of State under Chapter 1 of Part 2 of the Police, Crime, Sentencing and Courts Act 2021 (“the PCSC Act”).¹²
2. The Serious Violence Duty (“the Duty”) places a new statutory duty on specified authorities to collaborate with each other to prevent and tackle serious violence. We recognise that the intention of the Duty is to protect communities from harm, save lives and prevent injury. These are aims which we wholeheartedly support – serious violence is a human rights issue which devastates communities across the country, hindering many peoples’ ability to live safe and dignified lives. It demands an evidence-based and just response that works with, not against, communities that bear its brunt.
3. As detailed in our joint briefing on Part 2 of the PCSC Act 2022 as it was making its way through Parliament,³ we remain fundamentally opposed to the Duty due to the following concerns:
 - a. The Duty would risk further criminalising communities over addressing root causes by being **police-led and enforcement-driven**.

¹ Serious Violence Duty: Draft Statutory Guidance for Responsible Authorities – Government Consultation. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1081432/Government_Consultation_on_Serious_Violence_Duty_Draft_Statutory_Guidance_Final_.pdf

² Serious Violence Duty: draft guidance for responsible authorities. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1081228/Annex_A_-_Serious_Violence_Duty_Draft_Statutory_Guidance_final.pdf

³ Joint briefing for House of Lords ahead of report stage of the Police, Crime, Sentencing and Courts Bill: Part 2, Chapter 1 (Serious Violence Duty), December 2021: <https://www.libertyhumanrights.org.uk/wp-content/uploads/2021/11/Joint-briefing-on-Part-2-SVD-for-report-stage-HoL-Stopwatch-Liberty-Unjust-AIUK-BBW-AYJ-Quakers-Runnymede-Fair-Trials-Justice-Medact-Defenddigitalme.pdf>

- b. The Duty as set out in primary legislation creates **wide powers and obligations of information disclosure** as well as carve-outs from duties of confidentiality and other restrictions. This will drastically expand the surveillance of over-policed communities, erode individuals' data protection and privacy rights, and undermine relationships of trust that are vital to the provision of care and support.
- c. There is an **absence of human rights, equalities, and data protection safeguards** in the Duty, and the Duty is coming into effect in the context of the wider erosion of the foundational bases of protections that would protect people's human rights and safeguard people's data through the Government's repeal of the Human Rights Act 1998 and 'reform' of the data protection legislation.

Question 1: Does the draft statutory guidance improve your understanding of the legislation relating to the Serious Violence Duty?

Yes, No, Any comments

- 4. As stated above, we are fundamentally opposed to the Serious Violence Duty. In addition, the Guidance itself suffers from the following deficiencies, that risks entrenching its harms.
- 5. **Our starting point is that a public health approach does not inherently rely on enforcement or the criminal justice system.** Indeed, in the World Health Organisation's definition contained in the Guidance, and which the Guidance encourages specified authorities to adopt, mention of enforcement and criminal justice are noticeably absent.⁴
- 6. **Notwithstanding its own stated objective of pursuing a public health approach, the Duty and draft Guidance unduly prioritises the role of the police in tackling serious violence.** First, the guidance affirms the position in the PCSC Act that local policing bodies will have the power to "monitor specified authorities'" exercise of their functions relating to the Duty.⁵ This creates a power imbalance, whereby specified authorities – who may actively choose *not* to collaborate, or seek to ringfence their collaboration, with the police on the basis of their expertise and relationships with the people they work with – are put in a subordinate position as regards the police. Further, while the Guidance repeatedly refers to the Duty as being a public health, multi-agency approach to tackling serious violence, requiring specified

⁴ Guidance, p.7

⁵ Guidance, pg. 10.

authorities to “collaborate and plan” together, it also states that “in adopting a public health approach, this should not be seen to in any way undermine or prevent the need for the valuable and vital work of the police and other partners in relation to enforcement and criminal justice-based activity.”⁶ This places an undue emphasis on criminal justice agencies while ignoring the importance of other public services that are vital to tackling the root causes of serious violence.

7. **Second, the Duty gives local policing bodies greater powers to demand information disclosure from public bodies than they currently have, in ways that potentially undermine existing frameworks that exist to protect people’s rights.⁷ This includes individuals’ personal data.** Under Part 2, Chapter 1 of the PCSC Act, the police will be able to demand information disclosure from specified authorities and educational, prison and youth custody authorities, even if this would breach those bodies’ existing obligations of confidence or any other restrictions on disclosure.⁸

8. In particular, **we are highly troubled by the draft Guidance’s repeated reference to personal data, which we view to be an implicit encouragement to public bodies to share “data pertaining to individuals” as part of their implementation of the Duty.** This is thrown into relief by the Guidance’s explicit reference to patient information as being exempt from the duty (as a result of amendments campaigned for and secured in the PCSC Act).⁹ This is in spite of the Minister of State Baroness Williams’ repeated verbal and written assurances during the passage of the PCSC Act that personal data will not be routinely shared under the duty, including in a letter to Baroness Brinton in which she stated that “[the Home Office] does not expect individual personal data to be routinely disclosed under this power as there are already existing mechanisms in place to permit this where necessary.”¹⁰

⁶ Guidance, p.8

⁷ Guidance, p.15

⁸ For example, the draft Statutory Guidance provides: “Section 16(3) provides that disclosures under section 16 do not breach any obligation of confidence owed by the person making the disclosure, or any other restriction on the disclosure of information (however, imposed.” Guidance, p.49.

⁹ Paragraphs 147 to 150, Guidance, pg.49.

¹⁰ Letter from Baroness Williams to Baroness Brinton regarding the committee stage debate: Serious Violence Duty provisions, 7 December 2021: http://data.parliament.uk/DepositedPapers/Files/DEP2021-0966/Letter_to_Baroness_Brinton_SV_duty_info_sharing.pdf

9. **We echo the concerns voiced by senior police advisors,¹¹ frontline workers,¹² and cross-party parliamentarians¹³ during the passage of the PCSC Act that the Duty risks being used to target and surveil particular individuals, by enabling and in some cases requiring the unfettered sharing of information about their interactions with public bodies and their access of different public services with the police.** Under the Duty, individuals' personal interactions with public bodies would effectively become data points that can be shared and used by other agencies (including the police) to glean information and make life-altering decisions about them, without their knowledge and consent, and absent vital human rights safeguards. Given the racialised policing of serious youth violence, this is likely to have a disproportionate impact on Black people, who already face the brunt of overpolicing. Indeed, in the notorious case of the Metropolitan Police Service's (MPS) Gangs Violence Matrix, individualised risk-profiling was shown to have deleterious impacts on people's ability to access housing, education, and other vital services – and in some cases, to have resulted in eviction, destitution and even death. The MPS Gangs Violence Matrix was ultimately found by the ICO to have been operating unlawfully, and Liberty is currently challenging the Matrix on the basis that it is disproportionately targeting Black people.
10. **Fundamentally, we question the failure of the Guidance to acknowledge the important reasons why information-sharing, including about individuals, might *not* currently take place, such as due to safeguarding, confidentiality, and other requirements that exist to protect individuals' rights, including their rights to a private and family life and their right to freedom of expression; and to preserve relationships of trust between frontline workers and the people they work with.** We note that during debates on the PCSC Bill, concerns were raised on the part of the British Medical Association (BMA),¹⁴ General Medical

¹¹ ITV News, Policing bill 'disproportionately impacts black men' and 'exacerbates violence', ex-chiefs warn, 25 October 2021: <https://www.itv.com/news/2021-10-25/policing-bill-could-undermine-trust-and-exacerbate-violence-ex-chiefs-warn>

¹² Liberty, Frontline workers warn policing bill puts young people at risk, 13 September 2021, available at: <https://www.libertyhumanrights.org.uk/issue/frontline-workers-warn-policing-bill-puts-young-people-at-risk/>

¹³ For example, see Baroness Meacher, in respect of an amendment to prevent identifiable personal information from being shared under the Duty: "All that we are asking for in the amendment and, indeed, the other two in the group is that the same respect for personal judgment be applied to teachers and youth workers as the Government now recognise should be given to doctors and others. Without these amendments, the work of the key public servants to prevent serious violence will be jeopardised, an issue that I should have thought the Government would be concerned about.." HL Deb 8 Dec 2021, vol.816, col. 1978; The Lord Bishop of Manchester: "The amendments that I and others have put our names to would, I believe, strengthen the Bill, making it clear that it is seeking not to set aside data protection law but to allow anonymised data to be shared where this will produce better policing outcomes. They would reassure children, vulnerable people, victims of crime and others that their personal data will not be shared, beyond that which is already shared under existing legislation" HL Deb 8 December 2021, vol.816, col.1981.

¹⁴ BMA, Police, Crime, Sentencing and Courts Bill – House of Lords: Committee stage, October 2021, available at: <https://www.bma.org.uk/media/4705/bma-briefing-on-police-crime-sentencing-and-courts-bill-hol-cttee-stage-oct21.pdf>

Council (GMC),¹⁵ British Association of Counselling and Psychotherapy (BACP),¹⁶ British Psychological Society (BPS),¹⁷ the Royal College of Nursing,¹⁸ National Data Guardian,¹⁹ and health workers,²⁰ as well as cross-party peers, that the serious violence duty would endanger patient confidentiality and exacerbate health inequalities. This ultimately resulted in amendments to the PCSC Act exempting personal medical information from being shared under the Duty. We believe the same principle – that unfettered data-sharing about individuals violates people’s rights and endangers relationships of trust and confidentiality – apply to all contexts involving interactions with public authorities. This is particularly important in the serious violence context, where trust is vital to young people being able to safely access public services. As highlighted by Lord Paddick, former Deputy Assistant Commissioner in the Metropolitan Police Service, “If you want to develop new strategies to tackle serious violence, it can be done without handing names, addresses and personal details to the police.”²¹

11. **Particularly perturbing is the failure of the draft Guidance to acknowledge the specific dangers that the SVD itself might pose to survivors of domestic abuse and sexual violence.** In particular, the “permissive information-sharing gateway” for data-sharing created by the SVD²² contradicts the Domestic Abuse Commissioner’s (DAC) recommendation that any data gathered under the Duty is depersonalised, so as to protect victims.²³ In a joint briefing by human rights organisations, migrant and expert organisations supporting survivors and working to end Violence Against Women and Girls (VAWG) on the

¹⁵ Lintern, S., Concern police will be able to ‘strong-arm’ NHS to hand over patient data under new plans, 17 October 2021, available at: <https://www.independent.co.uk/news/health/police-nhs-patient-data-bill-b1938998.html>

¹⁶ BACP, We join BPS in calling for changes to draft crime Bill, 20 October 2021, available at: <https://www.bacp.co.uk/news/news-from-bacp/2021/20-october-we-join-bps-in-calling-for-changes-to-draft-legislation/#>

¹⁷ British Psychological Society, Police, Crime, Sentencing, and Courts Bill Briefing, 20 October 2021, available at: <https://www.bps.org.uk/news-and-policy/police-crime-sentencing-and-courts-bill-briefing>

¹⁸ Sharma, R., What teachers and nurses think about their new legal duty to spot youth crime, 1 April 2019, available at: <https://news.co.uk/news/teachers-nurses-legal-duty-spot-youth-crime-home-office-275397>

¹⁹ Lintern, S., Plans to hand over NHS data to police sparks warning from government adviser, The Independent, 11 October 2021, available at: <https://www.independent.co.uk/news/health/nhs-data-guardian-police-covid-b1934912.html>

²⁰ Liberty, Frontline workers warn policing bill puts young people at risk, 13 September 2021, available at: <https://www.libertyhumanrights.org.uk/issue/frontline-workers-warn-policing-bill-puts-young-people-at-risk/>; also see: Aked, H., Blell, M., Cheung-Judge, R., Kaner, E., Kulasabanathan, K., Palmer, C., van den Berghe, C., and Wondrack, J., (2021). The public health case against the policing bill, London: Medact. Available at: <https://stat.medact.org/uploads/2021/11/The-public-health-case-against-the-policing-bill-web.pdf>

²¹ HL Deb 8 December 2021, vol.816, col.1984.

²² Paragraph 145, Guidance, pg.48.

²³ Excerpt from the DAC’s comment: “The Commissioner understands concerns that have been raised during the passage on the Bill regarding the sharing of data gathered under Part 2 and supports calls to ensure that any data gathered is depersonalised and that more explicit assurances are set out by the government to ensure that it is not used for the purposes of implementing Serious Violence Reduction Orders (SVRO) under Part 10 of the Bill, particularly in respect of victims.” See: Agenda, House of Lords Briefing for Report Stage of the Police, Crime, Sentencing and Courts Bill, January 2022: <https://weareagenda.org/wp-content/uploads/2022/01/Agenda-PCSC-Bill-HoL-Report-Stage-Briefing.pdf>

PCSC Act during House of Lords Report Stage (some of whom are signatories to this Consultation response)²⁴, parliamentarians were urged to heed lessons learned from debates on the historic Domestic Abuse Act and the DAC's *Safety Before Status* report in respect of the particular risks posed by data-sharing for migrant victims and survivors of abuse. We are concerned that the potential for data-sharing under the Duty to threaten individual privacy and place minoritised women and survivors, particularly migrant women, at risk by preventing their access to vital services, is not acknowledged as a specific risk factor, in spite of the Guidance's emphasis on ensuring that specified authorities understand that "domestic abuse and sexual violence" are included in the definition of Serious Violence.²⁵

12. **Finally, we are concerned about the draft Guidance's conspicuous focus on enforcement-related outcomes as the barometer for the success of the Duty.** In the chapter on monitoring and compliance, the Guidance lists "police data on charge rates for serious violence offences" as a useful source of information for measuring the success of a partnership.²⁶ But charge rates are not the only way to measure the reduction of serious violence. Different institutional bodies have differing institutional missions. As a document designed to guide public bodies' implementation of the Duty, we are concerned that the draft Guidance does not provide a framework for developing holistic, rights-informed measures of success that can be adopted by public bodies; yet again, it undermines the Duty's claim to be a public health approach and exposes it to be a fundamentally enforcement-led endeavour. With the creation of more and more hybrid civil-criminal orders like Knife Crime Prevention Orders and new Serious Violence Reduction Orders as introduced by the PCSC Act, more and more people – and especially young Black men – will get swept up into the criminal justice system, even without the need to have actually been involved in serious violence, due to the broad way in which such Orders have been drafted. Coupled with the Serious Violence Duty, the success of which is measured through the utilisation of such police powers, we are concerned that marginalised communities will continue to be overpoliced, with little impact on real instances of serious violence, all to prop up a flawed evidence-base.

13. We note that thousands of people each year are convicted of possessing an offensive weapon and receive a non-custodial sentence. This may include people who carried an offensive

²⁴ Joint VAWG Sector Briefing on the Serious Violence Duty and Serious Violence Reduction Orders, <https://www.libertyhumanrights.org.uk/wp-content/uploads/2021/12/Joint-VAWG-sector-briefing-on-SVD-and-SVROs-for-HoL-ahead-of-report-stage-Dec-2021.pdf>

²⁵ Guidance, p.13, parag 29.

²⁶ Guidance, p.83, parag 267.

weapons out of fear or for their own protection.²⁷ As one person appealing against an order to commit him to prison for breaching the conditions of a ‘Gang Injunction’ explained, he carried a flick knife in his waistband because “*my little brother died and he was stabbed and he was only 15, so after he died my best friend ... gave me a little flick knife to just hold – hold with me so that I'd be safe at all times, but I didn't know that I could be arrested for a flick knife that length.*”²⁸ Rather than giving them the support they need to feel safe, the Duty will subject people to heightened interference and enforcement which could result in gravely disproportionate outcomes for a one-off conviction. And by including a measure of success in the form of charge rates, the Guidance encourages a criminalising approach, devoid of an understanding of the root causes of serious violence and the acknowledgement that serious violence issues may in fact be more fittingly addressed in the hands of other agencies not centred on a model of criminalisation.

14. **In addition, we note that the draft Guidance exacerbates the ambiguities within the PCSC Act regarding the interaction of the serious violence measures with existing data protection safeguards.** As parliamentarians highlighted during debates on the PCSC Act, the language of Part 2, Chapter 1 deliberately qualifies existing data protection requirements, so that in determining whether disclosures of information under the Duty would contravene the data protection legislation, the powers conferred by the Duty “must be taken into account”.²⁹ This drafting is circular, and as a result is susceptible to being interpreted in a way that will allow the Duty to supercede the data protection legislation; effectively, data protection safeguards must be read in line with the Duty, rather than the Duty in line with data protection safeguards. Far from clarifying the implications of this drafting, the draft Guidance merely re-states “disclosures of personal data are only permitted if they are in compliance with the data protection legislation.” This is unhelpful for public authorities in determining whether they can follow the serious violence duty without breaching their data protection requirements, and could result in public authorities deferring to the police (in charge of ‘monitoring’ their implementation of the duty) even in cases where they may come to a different conclusion, such as in decisions pertaining to sharing personal information.

²⁷ The Government’s own gang activity guidance recognises that children, in particular, may have dual victim and perpetrator status and should be supported accordingly. See HM Government, Safeguarding children and young people who may be affected by gang activity, (2010).

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/189392/DCSF-00064-2010.pdf.pdf

²⁸ *Dougherty v. Chief Constable of Essex Police* [2019] EWCA Civ 55

²⁹ See s.10(5)(a), s.15(8), s.16(4)(c), and s.17(6)(c) PCSC Act 2022.

Question 2: Are there any specific aspects of the Serious Violence Duty that remain unclear (or are missing) after reading the draft Statutory Guidance? If yes, can you provide details?

Yes, No, Any comments

15. In the Voluntary and Community Sector (VCS) section the Guidance rightly emphasises the importance that VCS organisations “maintain their independence in order to uphold their role as advocates for their beneficiaries and the community and preserve the trust of their service users.”³⁰ Yet the same is not articulated when explaining how to engage with institutions such as schools, youth services, and children and young people themselves. This is a highly concerning absence.

16. The imposition of a legal requirement on places like schools to share confidential information – including individuals’ personal schooling data – to the police, is likely to damage trust and service delivery. We have already seen the damaging consequences of such data-sharing in the context of Prevent and the Hostile Environment. Professional boundaries and the obligations to which they give rise – such as confidentiality and safeguarding duties – are essential to protect people’s dignity and privacy, fostering relationships of trust, and delivering high quality care. These duties are grounded in domestic³¹ and international law,³² and articulated in professional standards and guidance.³³ They are particularly acute where public authorities are making decisions in regard to children. It is critical that multi-agency frameworks should not serve to circumvent these safeguards, and that providing a partnership model should have regard for differing institutional missions and professional obligations of the various agencies engaged.

17. Rather than affirm the primacy of existing professional duties, the Guidance confuses and distorts it. We are concerned that this will unravel relationships of trusts between teachers, social and youth workers who rely on trust to provide care. It will also result in inconsistent provision across different partnerships and local areas. Where young people feel they cannot confide in teachers or youth workers, this may undermine their function as a safe space and, counter-productively, limit their ability to identify those children most in need of support.

³⁰ Guidance, p.57, parag. 183.

³¹ Section 1, Children’s Act 1989.

³² Article 3, Convention on the Rights of the Child.

³³ Department for Education, ‘Working Together to Safeguard Children,’ 2018, <https://www.gov.uk/government/publications/working-together-to-safeguard-children-2>

18. Inadequate sensitivity is also given to the reality of engaging with children and young people, especially those who may already be vulnerable and who, as the Guidance states, are “in receipt of services that the agencies and bodies involved in the partnership provide.”³⁴ There is a risk that engaging with children and young people may in fact cause them more harm (see Question 3 below). Children and young people already in receipt of services offered by agencies and bodies involved in the partnership are likely to have complex safeguarding needs and may have experienced adverse childhood experiences. Exposing children to heightened enforcement and potentially criminalisation and imprisonment, rather than tailored support, runs counter to the UK’s international obligations, which are clear that arrest, detention and imprisonment for children should always be a last resort.³⁵
19. In its equality impact assessment of the PCSC Act, the Government acknowledged that the Duty will disproportionately impact ethnic minority and low-income communities, notwithstanding the fact that these communities are already over-represented in the criminal justice system. According to the Ministry of Justice’s own data (year to March 2020), “70 per cent of offenders convicted/cautioned for knife and offensive weapon possession offences were white, 18 percent were black and 7 percent were Asian.”³⁶
20. As a matter of law, this disadvantage may only be justified if it is a proportionate means of achieving a legitimate aim.³⁷ We do not consider these measures a proportionate means of achieving a legitimate aim given the (i) significant and damaging police intrusions the Duty would sanction into people’s everyday lives; (ii) the risk that existing disparities will become further entrenched (iii) the paucity of evidence that the Duty will have any crime-reducing effects; and (iv) risks that the Duty would actually exacerbate the conditions conducive to serious violence, such as by undermining access to vital services and young people’s relationships of trust and confidence in frontline professionals. With this in mind, it is particularly concerning that mention of the Equality Act, and the requirement for public authorities to have “due regard for the need to eliminate unlawful discrimination, harassment and victimisation” when undertaking their Duty work, is limited to just one paragraph in the Guidance document.³⁸ Furthermore, given that police will have specific authority to request information related to individuals from a broad range of authorities, we are concerned that

³⁴ Guidance, p.58, parag. 187.

³⁵ Article 37, Convention on the Rights of the Child.

³⁶ Knife and offensive weapon sentencing statistics: year ending March 2020.

<https://www.gov.uk/government/statistics/knife-and-offensive-weapon-sentencing-statistics-year-ending-march-2020>

³⁷ Section 19, Equality Act 2010.

³⁸ Guidance, 44, parag. 131.

there is no corresponding requirement within the Bill – nor is there are signposting within the Guidance – for them to undertake specific equality impact assessments to protect against disproportionate impact on particular groups.

Question 3: We are keen to include updated case studies to support the statutory guidance and to support continuous learning on serious violence. If you are able to provide a case study, please provide brief details below, including your contact details.

21. The stark race disproportionality in tools like the Metropolitan Police Service’s Gangs Matrix demonstrates that policing of serious violence is structurally racist.³⁹ It relies on the racialised concept of the ‘gang’, as well as other proxies for race and class, to mark people out for heightened policing. The Serious Violence Duty puts on a statutory footing the very same systemic failings of the Gang’s Matrix that were identified following investigations by the Information Commissioner’s Officer and the Mayor’s Office of Police and Crime (MOPAC). These investigations lead to the Matrix being substantially reformed, however it is now subject to ongoing review and still contributes to the over-policing of communities of colour, particularly Black men. Amnesty International’s 2018 report, informed by years of campaigning by organisations such as StopWatch and The Monitoring Group, found the Matrix to be racially discriminatory and led to many individuals experiencing serious harm including in relation to employment, education, housing and welfare.

22. The key failings of the Matrix were that it disproportionately targeted young black men; enabled sensitive data to be shared widely amongst a large group of local stakeholders without adequate data sharing safeguards; conflated victims of violence with the perpetrators of violence; and kept large numbers of individuals on a database where there was insufficient evidence or justification for their inclusion, resulting in a number of wider seriously negative impacts in respect of access to housing, education and jobs. We believe the Serious Violence Duty will lead to similar outcomes.

Question 4: To what extent do you agree or disagree with the following suggestions for support for local areas on the Duty?

³⁹ In 2019, 89% of people on the Matrix were people of colour while Black people accounted for 81%. See: <https://www.london.gov.uk/press-releases/mayoral/mayors-intervention-of-met-gangs-matrix>
Yet only 27 per cent of those responsible for serious youth violence are black.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
National seminars					
Peer support by operational experts					
National Facilitator					
Local consultancy support					
Other (please stage)					

Question 5: To what extent do you agree or disagree with the following suggestions for areas of support for local areas on the Duty?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Data and information sharing					
Strategic Needs Assessments					
Multi agency working					
Defining Serious violence					

Other (please stage)					
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Please provide details to support your response

23. Per the response to Question 1, we disagree, in principle, that establishing the Serious Violence Duty is justified. We therefore are against the provision of further support for local areas in order for them to fulfil the Duty.

For more information, please contact:

Sam Grant, Head of Policy and Campaigns, Liberty: samg@libertyhumanrights.org.uk

Silkie Carlo, Director, Big Brother Watch: silkie.carlo@bigbrotherwatch.org.uk

Habib Kadiri, Research and Policy Manager, StopWatch UK: habib@stop-watch.org

Sawsan Salim, Director, Kurdish and Middle Eastern Women's Organisation (KMEWO):
sawsan@kmewo.com

Halaleh Taheri, Executive Director, Middle Eastern Women & Society Operation (MEWSo):
halaleh.taheri@mewso.org

Sally Jackson, Chair of Trustees, FiLiA: sally@filia.org.uk

Dr Nicola Sharp-Jeffs, Founder & CEO, Surviving Economic Abuse (SEA):
Nicola.sharp@survivingeconomicabuse.org

Lizzy Jewell, Head of Communications and Engagement, Working Chance: lizzy@workingchance.org

Ms Souad Talsi, MBE, Interim CEO, Al Hasaniya Moroccan Women's Centre: souad@al-hasaniya.org.uk

Giselle Valle, Director, Latin American Women's Rights Service (LAWRS): gisela@lawrs.org.uk

Katrina Ffrench, Founder, Unjust: katrina@unjust.org.uk

Jen Persson, Director, Defend Digital Me: jen@defenddigitalme.org

Nannette Yousef, Policy Officer, Runnymede Trust: nannette@runnymedetrust.org

Karla McLaren, Government and Political Relations Manager, Amnesty:
karla.mclaren@amnesty.org.uk

Janaya Walker, Public Affairs Manager, End Violence Against Women Coalition (EVAW),
janaya.walker@evaw.org.uk