



Simon King  
Crime Reduction and Community Safety Group  
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2 Marsham Street  
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London, 24 April 2007

Dear Mr King

**RE: Violent Offender Orders**

We welcome the opportunity to submit our thoughts and views on the above proposals. The Runnymede Trust is an independent policy research organisation focusing on equality and justice through the promotion of a successful multi-ethnic society. Our mandate is to promote a successful multi-ethnic Britain – a Britain where citizens and communities feel valued, enjoy equal opportunities to develop their talents, lead fulfilling lives and accept a collective responsibility, all in the spirit of civic friendship, shared identity and a common sense of belonging. The criminal justice system (CJS) has long been of special concern to us.

Rather than provide a detailed response to the proposals, we would like at this stage to raise our serious concerns at the proposals to introduce yet another civil order without relevant race equality impact assessment mechanisms put in place.

The disproportionate impact of these proposals on black and minority ethnic communities is likely to be important. The consultation document states that we know from research that young white males are most likely to commit violent offences, followed by young black males. However, we would draw your attention to the fact that disproportionality at all stages of the (CJS) is also well documented,<sup>1</sup> a large part of which is down to institutional racism in the way the (CJS) operates.

The Home Office's record of monitoring and assessing the impact of its other civil remedies on black and minority ethnic communities is poor, as highlighted in our recent research on Anti-Social Behaviour Orders (ASBOs).<sup>2</sup> We therefore urge the Home Office to carry out a thorough Equality Impact Assessment and eagerly await its findings. This was not done adequately for ASBOs and as a result, we are currently witnessing an alarming gap in information on the potential disproportionate impact of ASBOs on black and minority ethnic communities, despite the measures being in place since 1999.

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<sup>1</sup> John G. (2003) *Executive Summary, Race for Justice: A review of CPS decision making for possible racial bias at each stage of the prosecution process*. Worthing: The Gus John Partnership Limited.

<sup>2</sup> Isal, S. (2006) *Equal Respect – ASBOs and race equality*. London: The Runnymede Trust

Furthermore, where mechanisms are in place to ensure that ethnic data *is* systematically collected, the completeness of the data in various CJS agencies is often far from satisfactory.<sup>3</sup> A similar situation with new Orders being introduced should be avoided at all costs.

We look forward to being kept informed of future developments.

Best wishes

Sarah Isal  
Senior Research & Policy Analyst

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<sup>3</sup> CJS (2005). *Root and Branch Review of Race and the CJS Statistics: Final Report*. London: CJS.