

The Rt Hon Shabana Mahmood MP
Home Secretary
Home Office
2 Marsham Street
London

Our ref:TP/FC14

18 June 2026

Dear Home Secretary,

Suffolk Constabulary: Accelerated cause of concern - PEEL 2025/27 – Response to HMICFRS’ report

Thank you for the opportunity to comment on this HMICFRS Accelerated cause of concern report.

Five recommendations were issued to address the concerns raised in relation to the management of the Domestic Violence Disclosure Scheme (DVDS), for which Suffolk Constabulary has provided a formal response. This response is attached and will also be published on my website.

I was concerned and disappointed that the response and management of the DVDS scheme was found to have serious shortcomings, and that existing victim contact methods were potentially increasing the risk to individuals who may have required support and protection.

Alongside staff in my office, I have liaised regularly and been kept up to date on a weekly basis by the Chief Officer team on immediate actions and progress made to address and rectify this accelerated cause of concern. I am reassured that the backlog of DVDS requests has now significantly reduced, from over 500 to approximately 150 with continued downward trajectory and plans for completion soon, with greater oversight from suitably experienced and trained senior officers, to ensure any safeguarding concerns and risks are swiftly escalated and responded to. I have also been reassured that links with partner agencies have been strengthened to assist in identifying people at risk and enabling safe and timely support, and new technology and tools are also being brought in to improve efficiency and consistency.

I understand that the detailed improvement plan from the Constabulary has been provided to HMICFRS, which has provided further assurance on the actions that have been taken. I will continue to monitor progress closely to ensure forward-facing activity and governance structures enables effective, safe and timely responses to the demand to uphold public confidence and to safeguard those at risk from Domestic Abuse. This will be via my regular meetings with the Chief Constable, as well as through the *Supporting Vulnerable Victims* report, which is presented at my Accountability and Performance Panel meetings.

Yours sincerely,



Tim Passmore, Police and Crime Commissioner for Suffolk



Response to HMICFRS' [accelerated cause of concern relating to the application of Clare's Law](#), May 2026

Following the fieldwork period for Suffolk's PEEL inspection in April 2026, HMICFRS issued an accelerated cause of concern in May relating to the management of the Domestic Violence Disclosure Scheme (DVDS, also known as Clare's Law). Such causes of concern are issued where HMICFRS identify serious or systemic shortcomings.

The inspection identified weaknesses in the management of DVDS in Suffolk, including insufficient processes, capability and capacity to support effective delivery. Inspectors highlighted a significant backlog of applications and concerns that existing victim contact methods were inadequate and could increase risk.

Five recommendations were issued to address these concerns. Suffolk Constabulary accepts these and this report sets out the response to each.

Delivery is being overseen through a Chief Officer-led operation addressing both the immediate backlog and associated risks, as well as the underlying systemic issues. A detailed improvement plan has been provided to HMICFRS, tracking actions, decisions, governance and progress.

Alongside the immediate response, work is ongoing to ensure a sustainable DVDS model. Using learning from the initial response, the constabulary is developing a resourcing approach aligned to increasing demand.

Recommendation 1

With immediate effect, the constabulary should make sure it understands the risks that the backlog may pose to vulnerable people and their families, so it can appropriately prioritise disclosures.

With immediate effect, Suffolk Constabulary has implemented a structured approach to assess risk within the DVDS backlog and prioritise disclosures accordingly.

All existing applications have been reviewed and prioritised based on risk and age. This included a full reassessment of the backlog, with high and medium risk cases prioritised first, followed by standard risk cases. Each review is supported by refreshed research and a documented risk assessment, providing a consistent basis for decision-making.

End-to-end tracking and management of DVDS applications has been revised to improve visibility across all stages. The framework enables monitoring from initial research through to disclosure and delivery, supporting the identification of any delays, emerging risks and systemic pressures. This is supported by

daily supervisory oversight to ensure safeguarding considerations are actively reviewed and escalated as required.

PND checks, along with overseas criminality checks where an individual is known or suspected to have resided abroad, are embedded within the process to ensure disclosure decisions are informed by the fullest available intelligence.

Recommendation 2

With immediate effect, the constabulary should implement a plan to clear these backlogs and make all required disclosures, through safe contact methods, without further delays.

With immediate effect, the constabulary has implemented a plan to clear disclosure backlogs and complete required disclosures without delay using safe contact methods.

At the outset, the backlog exceeded 460 applications, with additional cases identified through reconciliation. This was reduced to 185 within seven weeks. Applications are prioritised by risk and age, supported by a forward-facing function managing new applications alongside backlog reduction.

A dedicated DVDS team has been established, comprising detectives with safeguarding and domestic abuse experience, supported by intelligence and supervisory oversight. Resources are structured into backlog and forward-facing functions, with flexibility to respond to demand and any emerging system bottlenecks.

Disclosure and victim contact processes have been revised. Operational guidance, developed with input from specialist negotiators and IDVAs (Independent Domestic Violence Advisors), ensures engagement is safe, proportionate and trauma-informed, including consideration of contact methods, digital risks, and minimising the risk of perpetrators becoming aware of police involvement.

Where disclosure is appropriate, continued enquiry and alternative contact methods are required, with supervisory authorisation for decisions not to proceed. This is supported by enhanced recording requirements.

Additional measures include face-to-face engagement via Community Policing officers where safe remote contact is not possible, and contingency processes such as the application of PNC markers to support ongoing safeguarding opportunities for individuals not successfully contacted.

New tools and processes have been introduced to improve efficiency and consistency, including a bespoke research product to support information gathering, with appropriate safeguards for supervision, data protection and quality assurance.

Recommendation 3

Within three months, the constabulary should put in place a governance structure with oversight from senior leaders to promptly identify any increase in disclosure requirements that exceed the capacity of the multi-agency safeguarding hub.

Within the first seven weeks, the constabulary has established a governance structure with senior oversight to identify and manage increases in disclosure demand exceeding MASH capacity.

A dedicated operation was implemented, led by a Chief Officer (Gold), with operational management by a Detective Superintendent (Silver) and a Detective Chief Inspector (Bronze) overseeing tactical delivery. This Gold, Silver and Bronze structure provides clear leadership, accountability and oversight of DVDS activity.

DVDS is formally recognised as an organisational risk, subject to Chief Officer oversight. Governance arrangements include weekly Gold meetings, daily performance and safeguarding reporting, and defined escalation routes to manage risks, capacity pressures and operational challenges.

A structured decision log captures key strategic and operational decisions and their rationale, including changes to safeguarding practice, policy, workflows, and the introduction of new tools and processes, providing a clear audit trail.

Reporting arrangements have been strengthened, with performance reporting in place to provide a consistent and accurate view of activity during the recovery phase. Work is ongoing to develop a longer-term performance dashboard aligned to the future operating model.

Plans are in place to sustain DVDS delivery beyond backlog clearance. While some temporary resources will return to substantive roles, an enhanced core capability will remain to manage ongoing demand.

This function will be led by a Detective Sergeant within the Multi-Agency Safeguarding Hub, reporting to a Detective Inspector, ensuring clear accountability and alignment with wider safeguarding arrangements. This reflects recognition that the function was previously under-resourced and establishes a more sustainable model to mitigate future backlog risk. The enhanced capability will remain while longer-term arrangements are finalised.

Ongoing governance is provided through the Domestic Abuse and RASSO (Rape and Serious Sexual Offence) Delivery Board (chaired by a Detective Chief Superintendent) and the Local Policing Board (chaired by the Assistant Chief Constable), both meeting bi-monthly to provide scrutiny, performance oversight and accountability.

Recommendation 4

Within three months, the constabulary should establish a sustainable disclosure system that meets all statutory duties under the Domestic Abuse Act 2021 and gives timely support to vulnerable people.

Within the first seven weeks, the constabulary has taken steps to establish a sustainable disclosure system aligned to statutory duties under the Domestic Abuse Act 2021 and to support timely safeguarding for vulnerable people.

An end-to-end review of DVDS processes has been completed, and an interim operating model implemented to provide more timely responses, with increased structure and control to support the management of demand and delivery of disclosures.

Work has been undertaken to strengthen links with partner agencies, including the introduction of information-sharing arrangements with IDVA services and other support organisations to assist in identifying people at risk and enabling safe and timely engagement and support.

Engagement with national leads, the College of Policing and academic partners is ongoing to support alignment with emerging practice and wider learning.

Further work is underway to determine the resourcing model required to support a sustainable approach and ensure continued compliance with statutory requirements and increasing demand.

Recommendation 5

Within three months, the constabulary should make sure that officers and staff working in the disclosure process have the right skills, training and experience to make prompt safeguarding referrals that help manage and reduce the risk to vulnerable people.

DVDS activity has been aligned to appropriately skilled personnel to support consistent and informed decision-making. This includes the deployment of accredited detectives with safeguarding and domestic abuse experience.

Targeted training has been delivered to staff involved in DVDS, focusing on risk assessment, disclosure thresholds and safe victim engagement. Training has also been delivered to raise awareness of digital footprint risks when contacting victims alongside guidance for safe contact methods.

IDVA services have contributed to reviewing disclosure content and developing guidance, supporting a more informed, consistent and victim-focused approach. This engagement will continue as processes evolve.

Supervisory arrangements have been strengthened, including oversight of key decisions, enhanced recording of rationale, and structured review of cases where disclosure has not been achieved. Additional audit and scrutiny processes are in development, including a multi-agency DVDS scrutiny panel aligned to established best practice.

Collectively, these measures have strengthened capability, improved oversight and clarified accountability. Early performance data indicates improved timeliness, reduced backlog, and more consistent, appropriate safeguarding referrals, enabling disclosures to be delivered more quickly to those at risk.