

The Rt Hon Priti Patel MP  
Home Secretary  
Home Office  
2 Marsham Street  
London

Our ref:TP/VS

8 November 2021

Dear Home Secretary

**RE: HMICFRS report: Final Inspection Report, Police response to violence against women and girls**

Thank you for the final report on the police response to violence against women and girls. Suffolk Constabulary has provided a response to these recommendations, which is attached.

Preventing and tackling violence against women and girls remains a priority for my office, and for the Suffolk Constabulary. It is reflected in my Police and Crime Plan and through my commissioning of services to support victims.

My office is working in partnership with local agencies to review the Suffolk Violence Against Women and Girls Strategy. I agree with the HMICFRS recommendation regarding the importance of multi-agency response in this area. It is at a local level, in partnership, that our efforts can have the most impact to prevent crime, support victims and reduce reoffending.

I will keep the Suffolk Constabulary response to the recommendations under review through my accountability arrangements.

Yours sincerely



Tim Passmore, Police and Crime Commissioner for Suffolk



<b>Subject</b>	<b>HMICFRS Final Inspection report 'Police response to violence against women and girls' (Published September 2021)</b>
<b>Date</b>	12 <sup>th</sup> October 2021
<b>PURPOSE</b>	Suffolk Constabulary Response.
<b>PREPARED BY</b>	T/DCS Andy SMITH
<b>COMMISSIONED BY</b>	N/A

## Introduction

This report summarises the Constabulary's immediate response to the HMICFRS final inspection report entitled 'Police response to Violence Against Women & Girls' published on 17<sup>th</sup> September 2021. This inspection report was commissioned by the Home Secretary in March 2021 and follows an interim report which was published by HMICFRS in July 2021.

## Summary

This final inspection report makes clear the extent to which certain violent and high harm crimes disproportionately effect women and girls, notably domestic abuse, sexual violence, stalking and female genital mutilation.

The HMICFRS conclude that crime statistics reflect an epidemic of violence and abusive offending against women and girls in England and Wales and growing feelings of unsafety within the female population.

It is emphasised that the police alone cannot solve violence against women and girls (VAWG) and that this is a societal problem which requires a societal response. Nevertheless, it is highlighted that the police service has unique powers and responsibilities to protect victims from further harm, pursue perpetrators and prevent crime.

It is acknowledged that vast Improvements have been made by the police service in their response to VAWG, over the last 10 years. However, inspection activity has identified that inconsistencies still exist at every level in how the police respond to VAWG and victims, at individual, force, partnership and governmental levels. The following inconsistencies are summarised as follows.

- Differences in standards and provision of service and care for victims at an individual level, including recording of protected characteristics.



- Variations in the use of protective powers, including applications for domestic violence prevention and stalking protection orders and timeliness of enforcement in response to breaches of non-molestation and restraining orders.
- Variations in prevention activity, including that which is focused on the night-time economy, schools' engagement and online crimes.
- Differences in the approach to offender management.
- Differences in performance monitoring and scrutiny.
- Concerns as to level of crimes finalised with outcome 15 (evidential difficulties, suspect identified, victim supports) & Outcome 16 (evidential difficulties, suspect identified, victim does not support further action)
- Low use of evidence led prosecutions and falling conviction rates for VAWG offences.
- Variations in governance & partnership arrangements across the police service.
- National level actions relevant to VAWG are split over multiple government strategies which is in stark contrast to other high harm policing areas.

## **Recommendations**

The following recommendations are made within this report.

- 1) Immediate & unequivocal commitment that the response to VAWG offences is an absolute priority for government, policing, criminal justice system and public sector partnerships”.
- 2) The relentless pursuit of adult perpetrators should be a national priority for the police, and their capability and capacity to do this should be enhanced.
- 3) Structures and funding should be put in place to make sure victims receive tailored and consistent support.
- 4) All Chief Constables should immediately review and ensure that there are consistently high standards in their forces responses to violence against women and girls and should be supported in doing so by national standards and data.

By March 2022, C/Constables should establish & publish an action plan detailing what steps the force will take to improve and standardise its approach to responding to VAWG offences, with the aim of ensuring policies, process and practices are effective, actively monitored and managed and meeting national standard. This should include but is not limited to: -

- Use of police powers to protect women (arrests, pre-charge bail, applications for orders, response to breaches of orders)
- Use of Domestic Violence Disclosure Scheme.



- Capability of generalist and specialist staff
- ID high harm offenders working in partnership
- ID and protection of most at risk victims
- Internal and public communications

(By December 2021 NPCC lead should set a framework for force level action plans Requirements of College of Policing).

5) Immediate review of use of outcomes 15 and 16 in violence against women and girls.

Whilst not a formal recommendation, the final inspection report sets out the potential benefits of developing a more effective strategic response to VAWG which is similar to that adopted in other high harm areas of policing (Prevent, Protect, Pursue, Prepare). In supporting this view HMICFRS references the following considerations: -

#### Prepare

- Importance of single senior lead & strategy.
- Importance of engagement – use of victim surveys /communication women & young girls.
- Recording crimes accurately.
- Investing in training, development and wellbeing of investigative staff.

#### Prevent

- Work in schools & other educational establishments.
- Domestic Violence Disclosure Scheme (Clare's law).
- Crime prevention (including online crime prevention).
- Multi-Agency Risk Assessment Conferences (MARAC).
- Consider feedback from victims (examples cited as follows)
  - *Arresting & charging more offenders.*
  - *Taking reports more seriously at beginning, prioritising, stop victim blaming.*
  - *Speeding up process for dealing with offences.*
  - *Supporting victims, listening to concerns about safe spaces (patrols /visibility).*
  - *Tagging & monitoring offenders.*
  - *More prosecutions, harsher punishments.*

#### Protect

- Protective Orders, DVPN/O, Stalking protection orders.
- Offender Management (Multi Agency Tasking and Co-ordination).



- Identification & management of perpetrators who pose the most risk to women.
- Intervention options (College of policing to assist in development of guidance).
- Identification of vulnerable victims.
- Advocate services (IDVA's, safety planning).

## Pursue

- Responding to calls for service.
- Length of time to respond to breach NMO & restraining orders (performance monitoring).
- Specialist investigators (RASSO).
- Response to online crime (phone/computer exam).

## Suffolk Constabulary overview

The following sets out the constabulary's position with regards to specific recommendations made to chief constables.

Whilst Suffolk Constabulary and our partner agencies have made considerable progress in tackling VAWG over the past decade, we absolutely recognise that there is more to be done to ensure we provide a consistently effective response to all VAWG crimes, ensuring that all victims receive a service which reflects the trauma associated with this type of criminality. We understand the importance of taking steps to improve measures to prevent crimes, protect women and girls and this includes the relentless pursuit of offenders.

A recent survey undertaken with female residents in Suffolk earlier this year has reinforced that there is more we need to do to reduce fear of crime and improve confidence and satisfaction in our response to VAWG.

The abhorrent murder of Sarah Everard and countless other incidents nationally have undoubtedly served to further erode confidence and satisfaction in the police service and in this context, we are committed to prioritising efforts to improve the service we provide.

**Recommendation 4**

All Chief Constables should immediately review and ensure that there are consistently high standards in their forces responses to violence against women and girls and should be supported in doing so by national standards and data”.

“By March 2022, C/Constables should establish & publish an action plan detailing what steps the force will take to improve and standardise its approach to responding to VAWG offences, with the aim of ensuring policies, process and practices are effective, actively monitored and managed and meeting national standard. This should include but is not limited to.....”

- Use of police powers to protect women (arrests, pre-charge bail, applications for orders, response to breaches of orders)
- Use of Domestic Violence Disclosure Scheme
- Capability of generalist and specialist staff
- Identify high harm offenders working in partnership
- Identify and protection of most at risk victims
- Internal and public communications

By December 2021 NPCC lead should set a framework for force level action plans  
Requirements of College of Policing

In responding to recommendation 4, it is important to note that Suffolk Constabulary has been working as part of a well-established county wide community safety partnership (CSP) arrangement, through Safer Stronger Communities Board, to jointly tackle VAWG.

The Suffolk Safer Stronger Communities Board operates a VAWG steering group with senior representatives from across partner agencies.

More specifically, a VAWG (& men and boys) strategy and action plan is in place for the period 2018 – 2021 and this provides a solid foundation upon which to continue to deliver effective partnership working.

Work to review and update the Suffolk VAWG strategy commenced in September 2021 (involving the Police, Office of the Police and Crime Commissioner and other key local partners).

This review is cognisant of recent government and HMICFRS publications and in due course that which is expected from NPCC and the college of policing.

In addition, it is important to note that internal reviews and improvement work is ongoing as part of the constabulary’s approach to rape, serious sexual offences and domestic abuse. These areas form a significant proportion of criminality constituting VAWG and there are already well established internal and external governance arrangements to maintain and improve service delivery.

Separate reports have recently been provided to OPCC setting out our position in relation to our response to recommendations in respect of the police response to rape, serious sexual offences and domestic abuse.

**Use of police powers to protect women**

In mid-September 2021 a briefing paper was provided to OPCC in response to a HMICFRS report entitled ‘A duty to protect – Police use of protective measures in cases involving violence against

women and girls'. In outlining our current use of protective measures this briefing paper concluded that we recognise that there is more to be done to increase both the knowledge and use of all protective measures. Suffolk constabulary is actively seeking rapid improvement in the appropriate use of protective measures and plans are being developed to further communications, training and enhanced performance monitoring requirements. A force lead (DCI) has been appointed to help co-ordinate activity in respect of embedding and improving force performance.

### **Use of domestic violence disclosure scheme**

A refreshed action plan has been introduced for domestic abuse and an improvement co-ordination group established which is led by the constabulary's head of crime safeguarding and incident management command. This plan incorporates detailed activity required including a requirement to make effective use of the domestic violence disclosure scheme (DVDS). Planning is also underway to ensure the constabulary adapts to new legislation introduced by the Domestic Abuse Act 2021.

### **Capability of generalist and specialist staff**

There is an ongoing requirement to ensure the constabulary continues to invest in the recruitment, retention and training of detective and other specialist resource with responsibility for dealing with VAWG related offences.

The constabulary has progressed a number of measures to improve the capabilities of generalist staff including through training inputs and other activity which is co-ordinated by a joint Investigations Improvement Board (IIB chaired by Joint ACC) and our force performance improvement unit (PIU). Key examples of improvement work undertaken includes monthly crime and incident audits, bespoke audits, reviews and targeted training to operational staff (Operation Investigate) and Domestic Abuse matters – safer lives training.

### **Identify high harm offenders working in partnership / Identify and protection of most at risk victims**

In March 2020, the chief constable launched a strategic plan for the constabulary (2020-2023), this provides clear priorities at the heart of which is a focus on preventing harm, particularly concerning the most vulnerable in our communities.

Key measures of success being identified as follows: -

- Developing and implementing an intelligent problem-solving and evidence-based approach.
- Enhanced problem-solving approach with partners focused on victims, offenders and locations.
- Greater focus on offenders causing most harm.
- Developing improved ways of identifying and addressing threat, risk and harm.
- Improved early intervention with partners.

Significant improvements have been made in respect of how the constabulary manages wanted persons and suspects and this has attracted positive comment from HMICFRS in previous PEEL inspections.

Monthly performance data concerning investigations with outstanding suspects and wanted persons is provided to operational leads to ensure requisite focus and timeliness in response, particularly to high harm offenders.



Innovative initiatives have also been introduced to protect the public including a domestic abuse perpetrator unit and use of polygraph technology. Multi-agency partnership work is well established to ensure the effective management of high harm offenders, notably through our public protection and integrated offender management teams and MARAC processes.

Similar progress has been made with regards to the identification and protection of most at risk victims. Recent measures have been introduced within our CCR to ensure more consistent application of the THRIVE process to identify vulnerability at the earliest opportunity and to ensure the most appropriate response to calls for service. This includes identification of repeat victims.

The Constabulary operates within a very well-established and effective safeguarding partnership structure. Managers from within our Crime Safeguarding and Incident Management Command are active members of crucial child and adult safeguarding groups. Operationally, officers from the safeguarding investigation units have daily interactions with partner agency teams as well as members of the many charitable sector organisations in our county. Our Multi-Agency Safeguarding Hub operating model in Suffolk has been strongly endorsed by Ofsted for its good practice and information sharing.

The constabulary is in the process of implementing a key analytical tool 'V-VOL' (Vulnerability – victim, offender, location) which will serve to enhance our ability to identify repeat victims, offenders and locations. This will enable even more effective targeting of resource to help protect the most vulnerable and pursue the most persistent and/or dangerous of offenders.

#### **Recommendation 5**

Immediate review of use of outcomes 15 and 16 in violence against women and girls.

Suffolk constabulary has a well-developed formal monthly crime audit process which involves mandatory Inspector audit of crimes. Results of these crime audits are collated and analysed to address service improvement requirements. These audits regularly feature crimes with outcomes 15 and 16 and will continue to ensure we have suitable scrutiny in this regard.

Furthermore, the force performance improvement unit (PIU) is undertaking an in-depth review of domestic abuse crimes. This review heavily incorporates crimes with outcomes 15 & 16. The findings of this review will help inform improvement requirements which will be managed through our Investigations Improvement Board (IIB).

In addition to ongoing activity aimed at improving supervisory oversight of crimes, work has been commenced to identify and embed best practice in respect of using evidence led prosecutions.

The introduction of our 2025 performance improvement unit is supporting the constabularies drive towards achieving excellence in investigations and provides significant additionality to identifying and addressing areas for improvement.





## Summary

We are committed to improving our response to VAWG offences and establishing the trust and confidence of all women and girls in our service as well as reducing attendant fear of crime.

It is imperative we continue to work with partners on the Suffolk Safer Stronger Communities Board recognising that the constabulary alone cannot resolve VAWG offending and building on progress established to date. This is a societal problem which requires a multi- agency led societal response.

Suffolk Constabulary and other community safety partners will ensure that an action plan is developed within the timeframe set out by the HMICFRS (March 2022 publication).

Further updates will be provided to OPCC relevant to progression of strategic plans and associated activity.