



24 September 2021

Dear HMICFRS

I acknowledge that the Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) team published on the 17 September 2021 – Police response to violence against women and girls.

The OPCC understands that on 26 March 2021, the Home Secretary commissioned HMICFRS, under s54(2B) of the Police Act 1996, to carry out a bespoke thematic inspection “into police handling of female victims and engagement with women and girls”.

Bedfordshire Office of the Police and Crime Commissioner notes that there was an expansion of the three interim report recommendations which were:

### **Recommendation 1**

*There should be an immediate and unequivocal commitment that the response to VAWG offences is an absolute priority for government, policing, the criminal justice system, and public-sector partnerships. This needs to be supported at a minimum by a relentless focus on these crimes; mandated responsibilities; and sufficient funding so that all partner agencies can work effectively as part of a whole-system approach to reduce and prevent the harms these offences are causing. There needs to be an immediate upwards shift in the prioritisation of VAWG offences in policing*

Recommendations in this area include:

- the introduction of a new statutory duty for partners to work together to protect women and girls;
- the development of a statutory framework for wider partnership working, which we suggest could have the same intent and focus as the frameworks in place for child protection in England and Wales; and
- other work to better define and mandate joint working arrangements.

### **Recommendation 2**

*The relentless pursuit and disruption of adult perpetrators should be a national priority for the police, and their capability and capacity to do this should be enhanced*

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HMICFRS stated in their interim report that an effective criminal justice system is critical to ensuring that perpetrators are held to account for their crimes, and for behaviours to be addressed in a way that stops further crimes being committed. The police need to have sufficient resources to be able to respond to the changing demand and complexity of these crimes. They should also assure themselves that they are performing in a way that the public would expect in prioritising violent crimes against women and girls.

### **Recommendation 3**

*Structures and funding should be put in place to make sure victims receive tailored and consistent support*

HMICFRS stated in their interim report that victims' needs should be a central consideration of any investigation. Victims should be fully supported towards a result that reflects their wishes and considers any discrimination and inequality they may face. Consistent and accurate recording of information on the protected characteristics of victims is needed to help ensure the right support is offered.

The OPCC also notes that HMICFRS made five overarching recommendations in the final report:

### **Recommendation 1**

**There should be an immediate and unequivocal commitment that the response to VAWG offences is an absolute priority for government, policing, the criminal justice system, and public-sector partnerships. This needs to be supported at a minimum by a relentless focus on these crimes; mandated responsibilities; and sufficient funding so that all partner agencies can work effectively as part of a whole-system approach to reduce and prevent the harms these offences are causing.**

*The police cannot tackle violence against women and girls (VAWG) on their own. By the time there is a response from the police, a crime has been committed, but action is needed to prevent it happening in the first place. The only way we can achieve bold and sustainable change is if national and local government, partner agencies, and organisations work together with the police to prevent women and girls becoming victims, and make sure those who do become victims receive all the support they need.*

*For this approach to be effective, VAWG needs to be a higher priority. All agencies involved need to have a relentless, consistent and co-ordinated focus on it, and the whole system needs to be accountable for tackling these offences.*

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*We recommend the following actions, all of which are needed to make sure the whole-system approach is successful in protecting women and girls. These actions should be supported by a clear and rapid implementation plan that provides a pathway for how and when change is going to happen.*

To increase the prioritisation of VAWG offences in policing, we recommend:

### **Recommendation 1.1**

Immediately, the National Police Chiefs' Council and the Home Office should jointly appoint a full-time NPCC VAWG National Delivery Lead to lead on all police activity related to violence against women and girls. The lead should act as a point of contact for each police force, work closely with the College of Policing to make sure best practice is identified and communicated, ensure progress is monitored, act as the 'voice of policing' at cross-sector national discussions and regularly report to the Home Secretary.

### **Recommendation 1.2**

Immediately, the Home Office should add the policing of violence against women and girls to the Strategic Policing Requirement.

### **Recommendation 1.3**

By December 2021, the Home Office should make sure that violence against women and girls is a priority for the ministerially chaired crime and policing performance board.

### **Recommendation 1.4**

By January 2022, the Home Office and the national policing lead should develop a new National Policing Strategy for violence against women and girls (VAWG), to elevate the priority of VAWG and set a clear direction to forces on what is expected. Consideration should be given to establishing an annual strategic assessment of VAWG to support this strategy, and to using the 4Ps as a delivery framework to implement it. This framework should emphasise the role of effective partnership working, a strong and clear policing culture, and continuous improvements across all the four strands.

*To increase the prioritisation of VAWG as part of a whole-system approach, we recommend:*

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## Recommendation 1.5

By March 2022, the Home Office should work with other government departments, including the Department for Education, Department for Health and Social Care and Ministry of Justice, to come to an agreement on the measures and actions that each partner agency needs to implement both at national and local levels to encourage joint responsibility in tackling violence against women and girls. This should be co-ordinated through the planned Home Secretary-chaired board. The agreement should also include sustained, multi-year funding to support collaboration between agencies, where they have joint responsibilities, and serious consideration of:

- a new statutory framework and statutory guidance to define roles, responsibilities and expectations; to standardise existing non-statutory arrangements; and to allow better accountability at local level, and support and scrutiny at national level;
- as part of this: a statutory duty requiring the police and relevant partner agencies to work together to collectively take action to prevent the harm caused by violence against women and girls (VAWG). In doing this, the Home Office should consider whether this could be included in any existing duties; how duties for safeguarding children will interact with and complement the changes; and how this duty will be incorporated into the new statutory framework for VAWG.

## Recommendation 2

**The relentless pursuit and disruption of adult perpetrators should be a national priority for the police, and their capability and capacity to do this should be enhanced.**

### Recommendation 2.1

By March 2022, the Home Office and the relevant National Police Chiefs' Council leads should review police capability and capacity to relentlessly pursue and disrupt the perpetrators of violence against women and girls offences and enhance these, as necessary.

### Recommendation 2.2

As part of the work to develop the Government's domestic abuse perpetrator strategy, the Home Office should carry out an urgent review of the role of the detective constable. This should establish appropriate incentives, progression

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and support for both officer and staff investigators to encourage this career path. This review should include specific recommendations to make sure there is adequate capacity and capability in every force to thoroughly and effectively investigate violence against women and girls offences.

### **Recommendation 2.4**

By March 2022, as part of the work to establish and implement the Government's perpetrator strategy, the NPCC VAWG National Delivery Lead, the Home Office and the Ministry of Justice should co-ordinate work to improve, review and standardise the current arrangements and capability for the management of VAWG offenders. This should aim to increase consistency in the use of multi-agency public protection arrangements, multi-agency tasking and co-ordination, and integrated offender management, and make recommendations to ensure there is sufficient capacity in the system to manage VAWG offenders effectively

### **Recommendation 3**

**Structures and funding should be put in place to make sure victims receive tailored and consistent support.**

*Victims' needs should be a central consideration of any investigation. Victims should be fully supported towards a result that reflects their wishes and considers any discrimination and inequality they may face. Consistent and accurate recording of information on the protected characteristics of victims is needed to help ensure the right support is offered.*

*The best result may not always be one within the criminal justice system. The needs of the victim are often complex. This means the range of support they should be given access to should be carefully considered and co-ordinated across victim services – some of which will be commissioned and others of which will be independent, such as advisers/advocates – and other agencies, including health and local authorities.*

*An effective pathway needs to be in place that offers the victim the right bespoke support, as well as the reassurance that they will be kept safe from any further violence by the perpetrator.*

*We recommend:*

### **Recommendation 3.1**

By March 2022, informed by and connected to work on the proposed Victims Bill,

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the Ministry of Justice, Home Office and other government departments should review funding to ensure it is sufficient for specialists to support victims making complaints to the point that they have received the outcome they need. The aim should be to provide funding so that an independent (non-legal) adviser/advocate is available to support victims of domestic abuse and sexual violence as they go through the criminal justice system (and should consider this

#### **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.**

*We recognise that elements of the whole-system approach we have recommended in this report will take time to establish. This could mean a delay to improvements in the service received by victims, and in the consistent effectiveness of policing in response to violence against women and girls more broadly.*

*Given this, and the significant inconsistencies between forces identified in this inspection, we are therefore recommending that all chief constables immediately review and improve the processes and practices related to VAWG in their forces, to make sure they are effective and consistent. Forces should be supported in this by much clearer national standards and data, and consistent and comparative information about the capacity and capability required to make improvements.*

*HMICFRS recommend:*

#### **Recommendation 4.1**

By March 2022, chief constables should establish and publish an action plan that specifies in detail what steps the force will take to improve and standardise its approach to responding to violence against women and girls offences, with the aim of ensuring policies, processes and practices are effective, actively monitored and managed, and meeting national standards. This should include (but is not limited to) improving and standardising:

- the use of police powers to protect women, including arrest of perpetrators, use of pre-charge bail, the applications for orders (where appropriate) and processes for responding to breaches of non-molestation and other orders;
- the use of the Domestic Violence Disclosure Scheme;

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- the capability of generalist and specialist staff to respond to violence against women and girls offences effectively, including consistent understanding of newer offences (such as coercive control);
- the identification and management of high-harm violent offenders against women and girls (in partnership with other organisations);
- the identification and protection of the most at-risk victims of violence against women and girls offences (in partnership with other organisations); and
- internal and public communications related to violence against women and girls to ensure that messages raise awareness of the risk and emphasise the seriousness of the issues

#### **Recommendation 4.2**

By December 2021, the NPCC VAWG National Delivery Lead should set a framework for the force-level action plans, and work with chief constables to make sure their action plans are in place. By June 2022, the national lead should then provide HMICFRS with an assessment of national progress, which establishes any potential gaps and areas for improvement.

This force-level activity should be supported by clearer standards and improved performance monitoring, to help chief constables better assure themselves of their forces' effectiveness in responding to VAWG, and to allow greater accountability, support and direction at local and national levels.

#### **Recommendation 4.3**

Immediately, the College of Policing should develop a violence against women and girls minimum standard, creating a consistent and clear standard for police investigations. The Home Secretary or the College of Policing should then consider whether to use their powers under section 53A of the Police Act 1996 to require police forces to adopt the procedures and practices it sets out.

#### **Recommendation 4.4**

By March 2022, the College of Policing and the National Police Chiefs' Council should establish mechanisms and processes to allow rapid and consistent sharing of evidence, information, and evaluation on new and effective ways of working in response to violence against women and girls offences.

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## **Recommendation 4.5**

By December 2021, the Home Office together with other government departments should introduce a set of measures to monitor improvements in the criminal justice system approach to all crimes that disproportionately affect women and girls. This should be developed together with women and children's representatives and include a strong focus on evidence of victim experience (and include such information as is necessary to identify and act on variation in service provided to women with different protected characteristics). The measures should enable better accountability and support at local and national levels. Where possible, this should complement the work the Government is already doing following its end-to-end rape review to develop a 'scorecard' for measuring improvements to rape crimes.

## **Recommendation 4.6**

By March 2022, the Home Office should work with other government departments, policing, and victim representatives and support organisations to build awareness of the importance of ensuring communications and terminology related to violence against women and girls are appropriate and don't have any unintended consequences.

## **Recommendation 5**

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

*HMICFRS are recommending immediate action to increase supervision and understanding of the use of these outcome codes (recommendation 5).*

*An unacceptably high number of domestic abuse, rape and other violence against women and girls cases are closed by the police using outcome codes 15 and 16. These numbers vary between forces, and there are significant gaps in the data and information gathered about these outcomes. This makes it impossible for policing to assure itself (or victims) that they are consistently closing these cases appropriately.*

*We therefore recommend that:*

### **Recommendation 5.1**

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By March 2022, the Home Office should review and refine the data on outcome codes gathered nationally and make improvements in the ways this can be used to identify trends and outliers.

### **Recommendation 5.2**

By December 2022, the NPCC VAWG National Delivery Lead should develop and disseminate to forces a process for consistent and robust monitoring of outcomes 15 and 16 violence against women and girls cases. This should require, as a minimum, inspector-level sign-off of these cases and that evidence on the rationale for these closure codes is recorded and auditable.

The OPCC note Next steps from HMICFRS will monitor police force progress against these recommendations in accordance with their standard monitoring process. HMICFRS will also request updates from national organisations on progress made in April 2022.

Bedfordshire OPCC will be working with Bedfordshire Police in the consideration of all recommendations which will be monitored and managed through the Learning Demand and Futures Board. The OPCC notes that the Police recommendations are reliant on other agencies responding to the report and recommendations in a timely manner so that the Police Forces can move forward.

I recognise this is an important assessment which requires serious attention and within my Police and Crime Plan we are working with Bedfordshire Police tackling violence against women and girls as a priority area, both at a systemic, cultural and enforcement level.

Yours Sincerely

**Festus Akinbusoye**  
Police and Crime Commissioner

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