

PCC and CC Force Supercomplaint response record

Version: To be submitted to APCC and NPCC

Force	Staffordshire
Police and Crime Commissioner	Ben Adams
Chief Constable	Chris Noble
Title of inspection	Police perpetrated domestic abuse
Inspectorate	  
Summary of inspection	<p>In March 2020 the Centre for Women’s Justice (CWJ), working with the Bureau of Investigative Journalism, submitted a super-complaint alleging that forces were not responding appropriately to cases of domestic abuse involving police officer or police staff suspects. Its submission included highly concerning victim testimonies that described victims feeling failed and sometimes further harmed by the police response.</p> <p>HMICFRS, College of Policing and IOPC have investigated CWJ’s concerns. It has been the most thorough review of the police response to domestic abuse cases involving police suspects to date. Our work has enabled us to draw some strong conclusions (although we have not conducted fieldwork in all forces and we have been able to look at some issues in more depth than others).</p> <p>Overall, our investigation, combined with evidence submitted by CWJ, leads us to conclude forces are not fully recognising and responding to the risks and responsibilities associated with these cases. There are systemic deficiencies in the police response to cases of police perpetrated domestic abuse in England and Wales and this is causing significant harm to the public interest.</p>
Grade	N/A
Recommendations	<ol style="list-style-type: none"> 1. To chief constables <ol style="list-style-type: none"> a. Chief constables should ensure that both live PPDA cases and those closed within the last 12 months (ending 30 June 2022) are audited. Appropriate action should be taken where they find cases were not treated appropriately as complaint and conduct matters and investigated accordingly. b. Chief constables should write, via the National Police Chiefs’ Council (NPCC), to the College of Policing, the IOPC and HMICFRS within six months explaining how, following their case audit, their force has or will improve the response to PPDA allegations, including in relation to: i. their handling of PPDA as a police complaint and conduct matter; ii. their compliance with existing relevant APP guidance or their rationale for derogating from it; iii. their monitoring of PPDA cases; iv. ensuring impartial, joined-up criminal and conduct investigations conducted by people with the right knowledge and skills; v. effective engagement and communications with victims; vi. ensuring that appropriate decisions are being made regarding the deployment of officers under investigation for domestic abuse allegations; and vii. other steps to embed the findings of this super-complaint into force working practices. c. The national framework for delivering better policing of violence against women and girls has already required forces to audit some live PPDA cases. We do not expect chiefs to audit the same cases twice. Chiefs should assure themselves that they have audited all live and recent PPDA cases, irrespective of the gender of the victim.

2. To chief constables
- a. Chief constables should make sure they have plans in place to ensure PPDA allegations are investigated (both in terms of the criminal investigation and misconduct response) by someone with no prior connection to any of those involved in the allegations. Rationales for investigation ownership decisions should be fully recorded.
 - b. It may be appropriate to refer a case for external force investigation when: i. there are concerns that truly independent investigators cannot be found in force. For example, in smaller forces or in cases involving a suspect who, due to seniority or length of service, is well known in force; or ii. victim trust and confidence cannot be secured another way.
 - c. Local plans should include procedures to mitigate any unintended consequences to the speed and quality of the investigation and/or victim engagement in the investigative process that may be caused by referring a case to an external force for investigation.
 - d. Chief constables should keep local plans for external force investigations under review. The recommendations and actions designed to expand what we know about PPDA (see below) should inform the development of local policies regarding when and how PPDA allegations are investigated by an external force
3. To police and crime commissioners (PCCs), the Ministry of Justice (MoJ) and chief constables
- PCCs, MoJ and chief constables should make sure their provision of domestic abuse support services and guidance is capable of meeting the specific needs of all non-police and police victims of PPDA. This should include the following:
- a. PCCs considering whether local services are capable of dealing with the specific risks and vulnerabilities of PPDA victims and supporting them when engaging with the police complaints and disciplinary system.
 - b. MoJ ensuring its guidance for independent domestic violence advisors includes guidance on the specific risks and vulnerabilities of PPDA victims and the specific support and advice they may need in relation to both the criminal and misconduct aspects of the police response.
 - c. Chief constables reviewing support available to police victims of PPDA, including that provided by the force, staff associations and other workforce support bodies, and taking any action needed to strengthen these provisions.
 - d. Chief constables assuring themselves that case updates and information are shared with victims in an accessible way that encourages trust and confidence in the police response. Consideration should be given to appointing a nominated senior person(s) in force (or from an external force) to have oversight of PPDA cases, to ensure they are conducted in a victim-focused way and to act as a point of contact for PPDA victims.
 - e. Chief constables ensuring they provide accessible information for all non-police and police victims on how they can report PPDA and access confidential support (including through external agencies, such as the Refuge 24-hour helpline). Chief constables should also ensure accessible information is provided on how allegations will be investigated in a way that ensures confidentiality and independence from the alleged perpetrator.
7. To all those subject to recommendations Advise the College of Policing, IOPC and HMICFRS within 56 days of the date of publication of this report whether they accept the recommendations made to them. Chief constables should direct their responses to the NPCC and PCCs should direct their responses to the Association of Police and Crime Commissioners (APCC). The NPCC and APCC will then share the collated responses with the College of Policing, IOPC and HMICFRS

Areas for improvement

Police Crime and Fire Commissioner initial response

It is vitally important that forces respond (and are seen to respond) robustly when domestic abuse allegations are made against police officers and staff. It is critical to trust and confidence in the service and for protecting against the risks of having domestic abuse perpetrators in police roles. I concur that it is essential that such allegations are immediately treated as complaint and conduct matters and dealt with through this formal route alongside criminal investigation. I have asked to see the results of the Staffordshire Police review of PPDA cases both currently live and closed in the last 12 months to see evidence of this compliance. I am in full support of the Staffordshire police's ongoing "Know the Line" campaign in support of driving out unacceptable behaviour in the force and in the learning that this super complaint investigation can impart.

In response to recommendation 3 specifically there is a recognised and established process between Staffordshire Police Professional Standards and the DA Commissioned provider, New Era Victim services and which supports victims of Police Perpetrated Domestic Abuse (PPDA) and the provider is fully capable and competent to provide confidential support as required. This approach is being adopted into a formal Force Policy, aligned to the DA commissioned provider for Staffordshire and Stoke-on-Trent.

Commissioned providers for both Domestic Abuse (DA) and Sexual Abuse (SA) are undergoing PPDA/SA Force training with two service providers (Catch 22 and Staffordshire Women's Aid) having completed training and two to follow (New Era and Staffordshire Victim Gateway).

Officers and staff have received training on PPDA and PPSA via the 'Know the Line' input and further awareness raising is planned via the Force Intranet and Access Boards located throughout the police sites.

Chief Constable response

In response to recommendation 1, a number of Staffordshire cases have already been identified for review and audit. A Detective Sergeant from within the Professional Standards Department and the Detective inspector for Safeguarding have been nominated to conduct this review. Following the results of this audit, any learning or necessary improvements in line with this recommendation will be put in place at the earliest opportunity and by Summer 2023 at the latest.

Initially these cases will fall into either PSD or ACU with the relevant professional integrity. Both departments have recently increased the number of Detective Constables or Investigating Officers who have PIP 2 Investigation accreditation. These staff will be responsible for all investigations of PPDA. Within Staffordshire there is currently in place existing relationships for peer review of investigations, as well as quarterly discussions with regional forces to identify best practice. Matters of this nature would form part of Staffordshire's People's Intelligence Board which is chaired by the Deputy Chief Constable every 28 days. Investigations subject to external review would also be discussed during the PIB process.

Staffordshire Police have a training package on a whole range of sexual misconduct matters called 'Know the line'. It includes support for victims, and where/how matters should be reported. This has been rolled out to a third of the work force so far but also a number of external partners. This has included training delivered to Victim's gateway and local Domestic Violence Support Groups. Further training is planned for later in 2022. A wider Know the Line communications piece has also been visible within Staffordshire Police since early 2021. This is subject to regular review, and new material is shared.

Welfare SPOC's are currently allocated to all victims of PPDA. Further work is on-going around additional documentation and guidance for non-police and police victims of PPDA. Independent review is something which Staffordshire Police support and the Detective Inspector of Safeguarding has been nominated to provide this independence.

There is currently a Confidential Reporting hotline for both internal and external victims of PPDA. These are directly monitored by PSD/ACU staff. Further work is on-going with external partners which will offer independent support networks, and additional avenues for reporting.

Police Crime and Fire Commissioner final response

I am confident that our commissioned provision of domestic abuse support services and guidance is capable of meeting the specific needs of PPDA victims and supporting them when engaging with the police complaints and disciplinary system. In addition, the Commissioner's compliance manager role provides independent assurance for IOPC referrals; assessment of police complaint reviews and recommendations and outcomes following police complaint reviews.

I will continue to review the actions taken by the force in response to the recommendations of this report as part of my ongoing accountability and performance assurance programme.