

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 Report	Report on Tees Valley Inclusion Project's super-complaint
Inspectorate	   <p>Independent Office for Police Conduct</p>
Summary of inspection	<p>On 7 August 2020, Tees Valley Inclusion Project (TVIP), in collaboration with the Halo Project charity, submitted a super-complaint called Invisible survivors: The long wait for justice. Police response to BAME victims of sexual abuse.</p> <p>This super-complaint investigation focuses on ethnic minority victims of sexual abuse. In this investigation, we comment on the police response to all victims of sexual abuse and what we know about the experiences of those victims who are from ethnic minority backgrounds. This, however, was significantly impeded by poor-quality ethnicity data recorded by the police. We make clear in the report which group of victims we are referring to. Tees Valley Inclusion Project, who submitted the super-complaint, is concerned that ethnic minority victims of sexual abuse receive a particularly poor service, which doesn't take sufficient or appropriate account of the specific risks and vulnerabilities they face. We found ourselves unable to gather compelling evidence that would either prove or disprove this concern. Information on the experiences of victims of sexual abuse is plentiful, recent and rich, but it lacks an in-depth consideration of differences in experience based on ethnicity or vulnerability connected to honour-based abuse. There are significant gaps in the data collected by the police as well as quality concerns. This is a well-known problem. We believe it has now become an intolerable one.</p>
Grade	N/A
Recommendations	<ol style="list-style-type: none"> 1. The risk of honour-based abuse We found forces generally only include the risk of honour-based abuse in their domestic abuse policies, so we recommend that chief constables update their forces' sexual abuse policies to include the risk of honour-based abuse. The College of Policing will update its existing sexual abuse authorised professional practice to include the risk of honour-based abuse. 2. Cultural awareness During our investigation, we found forces generally lack awareness and understanding of different cultures and religions. This means some officers are unlikely to recognise the wider risks of honour-based abuse after some victims report sexual abuse. Chief constables should make sure that: officers and staff are aware of the demographics of the communities they police so they can understand the nuances of different cultures and have time to learn about those communities; independent advisory groups or equivalent groups reflect these demographics; forces work with the local communities they police to prepare up-to-date information on culture and religion and ensure officers have access to it; and investigations consider any extra factors that might be relevant because of the culture and background of the victim or suspect. The information in the third point must include: the potential risks of honour-based abuse that some victims of sexual abuse face; and

any additional challenges and pressures relating to retraumatisation that victims of sexual abuse from different ethnic minority backgrounds may experience.

3. Data
 As part of the Government’s Tackling violence against women and girls strategy (2021), forces are working on understanding crime data in relation to sexual abuse and honour based abuse. Chief constables must prioritise this work. Tackling violence against women and girls is to become a strategic policing requirement in 2023. Forces should pay due regard to all elements of violence against women and girls, including honour-based abuse.

We are aware of the recently commissioned work taking place through the NPCC’s diversity, equality and inclusion co-ordination committee. This involves a working group with the College of Policing developing data standards for recording all protected characteristics. HMICFRS will also cover race and policing in its inspection programme, with the first two reports due to be published in early 2023.

We recommend that the NPCC and the College of Policing consider the findings from this investigation so they can be satisfied that the proposed changes and standards they are working on address the lack of recorded ethnicity data, including:
 data on voluntary attendance;
 data on the use of interpreters; and
 data on offering and providing special measures.

We recommend this work includes how officers and staff collect data, and their confidence and capability to ask the right questions.

4. Victim support
 Both police and crime commissioners (PCCs) and community safety partnerships include a consultation process as part of their work to identify their priorities. PCCs should make sure this consultation process is inclusive and representative of the whole community before commissioning services for victims.

PCCs should then work with local police, safeguarding partners and specialist support organisations to understand the needs of ethnic minority victims of sexual abuse who may be at risk of honour-based abuse. PCCs should consider these needs when commissioning local support services. The aim of this is to give victims the confidence to report incidents, to feel safe and empowered, and to stay involved in any investigation and prosecution.

5. To all those subject to recommendations
 Advise HMICFRS, the College of Policing and the Independent Office for Police Conduct (IOPC) 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 police and crime commissioners should direct their responses to the Association of Police and Crime Commissioners. The NPCC and Association of Police and Crime Commissioners 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) appropriately to all victims of sexual abuse no matter their ethnicity. It is critical to trust and confidence in the service for all officers and staff to be aware of the demographics of the communities they police so they can understand the nuances of different cultures. Improving neighbourhood policing capacity should allow officers to have time to learn about those communities and recognise the wider risks of honour-based abuse after some victims report sexual abuse.

In specific response to recommendation 4. The PFCC regularly commissions Victim & Witness Needs Assessments to monitor the needs of Staffordshire victims and witnesses across the whole CJS pathway to onward cope and recover support services. The Assessments findings provide an up to date picture of related needs and where, as partners, we need to focus our resources in the future ensuring that service users receive timely, needs led, good quality provision. We have undertaken a Victim and Witness Needs Assessment, SV Needs Assessment and more recently an SV Mental Health Needs Assessment.

Figures from our recent Victim and Witness Needs Assessment (2021) tell us that Ethnic groups are not generally over-represented. Broadly the ethnic demographic of the Force area recorded in the Census (2011), is matched by the ethnic demography of recorded victims of crime; 8% of the population belong to Black and Minority Ethnic (BAME) groups, compared to 6% of victims of crime. The first stage of the Assessment explores the current position in terms of crime, levels of victimisation, the criminal justice process and the broad impact of crime on victims and witnesses. The second stage focusses on the detailed experiences of victims and witnesses, identified through interviews. We will always include, where possible, victims of different gender, age, ethnicity etc.

The PFCC commission public perception surveys with 1600 residents per quarter. This provides sufficient granularity to understand perceptions at a district level and the results can be broken down by ethnicity. The survey seeks views on policing priorities and fair treatment of people from different backgrounds.

All of our commissioned service providers support victims regardless of their gender, age, ethnicity, disability, sexual orientation, religion or beliefs. Some of our Providers have specialist staff who specifically support BAME service users only.

SCO Commissioning Leads undertake quarterly monitoring and scrutiny contract meetings with all of the commissioned Providers. Data includes victim demographic information; age, gender, ethnicity etc. This allows us to monitor trends, gaps etc. This review includes service user outcomes, satisfaction surveys, complaints and to discuss with the Provider where modifications may need to be made.

Our sexual abuse service provider has invested in 'Recite Me', on their website which is an accessibility tool which enables the webpage to be automatically translated to the language of choice. It also has a raft of other accessibility options / tools. Our Victim Gateway service has also recently commissioned the same package and we are hoping other Providers will also follow suit.

Last year the PFCCs office established a service provider forum which meets on a quarterly basis and includes both DA and SV Providers. The role of the Forum is to capture victim feedback, both good and bad, about victim interactions with the Police, CPS and HMCTS as they traverse through the CJ process. The information collected is then fed back in to the system which is instrumental in influencing change, in particular service quality, training, processes and systems. This in turn provides a better service for victims in the long term.

Staffordshire University was commissioned to undertake a piece of research to review the effectiveness of support service provision to ethnically diverse communities in criminal justice responses to sexual violence. There is a paucity of research about support needs of ethnically diverse victims/survivors of sexual assault, and the Government's end-to-end Rape Review identified a need to engage with victims/survivors when reviewing service provision. The aims of the research included: Undertake a systematic review of national and international literature. Undertake a series of qualitative data collection events to document the specific needs and barriers that influence victims/survivors' decision to access support from sexual assault and abuse services. Develop appropriate evidence-based training materials and use these in a series of training sessions (including a 'train the trainer' event) to raise awareness about the needs of victims/survivors from under-represented communities. The recommendations from the research have been converted in to a delivery plan.

Targeted SV Campaigns – An awareness raising campaign of sexual abuse was undertaken in order to challenge common myths and perceptions, build both capacity and resilience within local

communities and increase awareness of the support services available to ensure victims know how to access support. The campaigns were central to the prevention of sexual abuse and community engagement. The mini focussed campaigns targeted specific cohorts (incl. BAME community) over a period of 12 months.

The PFCCs Office has just started work on commissioning two victim videos. One will be a training video for the Police and Partners to use as a training resource and the other video will be for promotional / awareness raising activity. They will both be based on real life case studies portrayed by actors, who will represent different ages, gender and ethnicity. The training video will portray victim vulnerabilities and what is important to a victim as they traverse through the CJS. The social media video will encourage victims from hard to reach groups to report their crime and seek support.

PPU Review – the Force has commissioned Price Waterhouse Cooper to undertake a Public Protection Unit redesign in order to enhance its performance in relation to recognising vulnerability and to build a service based on national best practice. The review is looking at 5 pillars, which includes domestic abuse and RASSO. An Implementation Plan will be developed for delivery over the next two years. Both service Providers and the SCO have been involved in the process to ensure victim voices are included in the redesign.

Chief Constable response

Staffordshire Police accept the TVIP super-complaint recommendations and have the following description of intended actions to be taken or already taken.

With regard to Recommendation 1, the risk of honour based abuse: Staffordshire Police are currently conducting a review of the Rape and Serious Sexual Offences policy. A commitment has been made to the reviewing officer that honour-based abuse must be included within the revised policy and this will be reviewed as part of the Specialist Crime Command Governance policy overview.

For Recommendation 2, Cultural awareness: The thematic police lead for this specific area of business will be working with Commanders across the Local Police teams and Specialist Crime Command to ensure that officers and staff are updated on the revision of policies and procedures. A training review is underway linking in with existing regional networks to ensure the revised training programme focus on honour-based abuse in the context of points A, B, C. Work is underway to improve the representation of the force IAG. Engagement with the Knowledge Hub will be essential to ensure Staffordshire prepares up-to-date information on culture and religion, which will be disseminated to staff.

Recommendation 3, Data: Staffordshire Police accept the recommendation and will work through our data collection and standards for recording all protected characteristics. This will be supported with work currently being undertaken within the Criminal Justice Unit in respect of data collection for interpreters, voluntary attendance and the whole of a victim's journey through the CJ process, including special measures and access to support and commissioned services. There will be exploration of the use of mandated field data capture and additional training to staff to ensure that data collection will be as robust and complete as possible.

Staffordshire Police acknowledge the TVIP super-complaint recommendations offering a commitment to drive this forward as part of the thematic work undertaken within the Honour Based Abuse Portfolio.

Police Crime and Fire Commissioner final response

The Commissioner as LCJB Chair has a particular interest in accurate ethnicity recording throughout the CJS and will continue to raise the profile of this area through the agreed performance framework under the LCJB fairness priority. The PFCC is also currently working on an end to end survey in order to capture victim's experiences from the point they report the crime through to when they exit services at the end of their journey. The results of the survey will identify both good and bad practice with regard to the victim journey and will be fed back in to the system so that necessary changes can be made to ensure we provide a good quality service to victims. We are hopeful that our results will include a variety of crime types, ages, gender, ethnicity etc.

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