

Rt Hon Priti Patel MP
Home Secretary
2 Marsham Street
London
SW1P 4DF

9th November 2021

Dear Home Secretary

Response to HMICFRS Report: ‘Final report: Inspection into how effectively the police engage with women and girls’.

Under Section 55(5) of the Police Act 1996, as Police and Crime Commissioner I am pleased to provide my formal response to the report by HMICFRS entitled ‘Final report: Inspection into how effectively the police engage with women and girls’.

Both the Chief Constable and I welcome the publication of the report. A report from the Chief Constable in respect of Cambridgeshire Constabulary’s response to the recommendations made by HMICFRS is attached at Appendix 1. I would also like to take this opportunity to expand on the content of the Constabulary’s response.

Supporting victims and witnesses is one of the pillars of my police and crime plan. Recognising that every victim’s experience is different and providing a quality service which maintains their trust and confidence in the criminal justice system, is one of my top priorities. In particular I have also ensured that the support services commissioned by my office are provided by specialists and enable a tailored approach to be given. These services have been bolstered over the recent year following successful bids for additional funds which I very much welcome.

In Cambridgeshire, I’m keen that we focus on what we are doing to target the perpetrators to prevent crimes against women and girls. The Constabulary’s recent successful bid to the Safer Streets 3 fund focused on early intervention and the prevention of crime and will fund training for CCTV operators and door staff to spot potential perpetrators acting suspiciously before they have a chance to approach anyone.

In August we also had a successful bid into the Home Office Domestic Abuse Perpetrator Fund, which has enabled three strands of work to begin to address intimate partner violence, adolescent to parent/carer violence and stalking behaviours.

As Commissioner, I am determined that our streets and homes become safe places for all women and girls. I hope this response, and that of the Chief Constable, provides reassurance regarding both Cambridgeshire Constabulary and my commitment to providing an effective and supportive response to victims.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Darryl Preston', written over a light grey rectangular background.

Darryl Preston
Police and Crime Commissioner for Cambridgeshire and Peterborough

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Enc - Appendix 1 – Cambridgeshire Constabulary's response to HMICFRS report 'Final report: Inspection into how effectively the police engage with women and girls'.

Cambridgeshire Constabulary's response to HMICFRS report 'Final report: Inspection into how effectively the police engage with women and girls'.

HMICFRS have set out five overarching recommendations in this interim report and some specific steps they consider necessary to achieve these:

1. 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. To increase the prioritisation of VAWG offences in policing, we recommend:
 - 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.
 - Immediately, the Home Office should add the policing of violence against women and girls to the Strategic Policing Requirement.
 - 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.
 - 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:
 - 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: 1) 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; and 2) 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.

Force response: The Constabulary is committed to tackling violence against women and girls (VAWG) offences. A new strategy sets out our strategic and tactical response to these offences including the provision of support for those affected. High-harm crimes that disproportionately affect women and girls, including domestic abuse; child sexual abuse and exploitation; modern slavery and human trafficking; and serious sexual offences are key strategic priorities for the force to ensure that we are targeting our resources to safeguard the vulnerable. The force continues to make significant improvements into how we respond to and investigate VAWG offences. These improvements include the introduction of Vulnerability Focus Desks and Domestic Abuse Early Intervention Desks with dedicated police officers and staff that provide front-line responders with fast-time information and safeguarding advice. A Vulnerability Performance Group has been introduced set clear investigative standards; scrutinise performance; and ensure that we are adopting the best safeguarding measures available. Training and continuous professional development for officers and staff on best practice and new legislation continues to be enhanced. The force also actively participates in local and national partnership initiatives focussed on preventing offences related to violence against women and girls.

The short- and medium-term steps set out by HMICFRS to achieve this recommendation are addressed to other policing bodies in the first instance. The Constabulary will await further information on progress against these to inform our ongoing work to tackle VAWG offences.

2. **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. We recommend:

- 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.
- 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 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.
- By March 2022, as part of the work to establish and implement the Government's perpetrator strategy, the Home Office, together with the Ministry of Justice, should improve the evidence it has about the management of perpetrators.
- By March 2022, as part of the work to establish and implement the Government's perpetrator strategy, the national policing 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 violence against women and girls (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.

Force response: The Constabulary is committed to ensuring that perpetrators are appropriately pursued and challenged. The capacity and capability of officers and staff across the force is regularly reviewed to ensure investigations are effectively managed and progressed. Crime standards and supervisory frameworks have also been reinforced to improve performance and ensure investigative excellence. The force has a specific offender and suspect strategy focussing on those offenders who cause most harm in our communities. As part of this, a bespoke perpetrator-focused operation has been in place to ensure high-harm perpetrators are brought to justice as swiftly as possible. The Constabulary also participates in a number of partnership initiatives to protect victims and prevent re-offending. Examples include the Cambridgeshire & Peterborough Domestic Abuse and Sexual Violence Partnership (DASV) Domestic Abuse Perpetrator Panel which is designed to identify and manage the highest risk perpetrators in the county; the Multi-Agency Stalking Intervention Programme (MASIP) with Suzy Lamplugh Trust to reduce risk and reoffending; and the Cambridgeshire Specialist Domestic Abuse Court's recent inclusion as one of only two mentoring courts nationally, to upskill criminal justice partners on the prosecution of domestic abuse offences.

The short- and medium-term steps set out by HMICFRS to achieve this recommendation are addressed to other policing bodies in the first instance. The Constabulary will await further information on progress against these to inform our ongoing work to tackle VAWG offences.

3. Recommendation 3: Structures and funding should be put in place to make sure victims receive tailored and consistent support. We recommend:

- By March 2022, informed by and connected to work on the proposed Victims Bill, 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 for victims of other crimes that disproportionately affect women). This support should be designed in consultation with the victim and should continue after a perpetrator is released from prison.
- By March 2022, all police forces should ensure information on the protected characteristics of victims is accurately and consistently recorded.
- By March 2022, informed by and connected to work on the proposed Victims Bill, the national policing lead, National Police Chiefs' Council leads and the Home Office should work together to establish guidance for all forces on how the views and experiences of victims should be recorded, analysed and considered as part of performance management of VAWG offences. As a minimum, this should include a single national survey to measure victim satisfaction, and processes to link local performance management data with the proposed national VAWG improvement measures (recommendation 4.4). This should allow for both local and national quality assurance, as well as the identification of any emerging issues, risks or variables that need further action to resolve. Police forces and partner agencies should have clear responsibilities in supporting victims through every stage of the case.

Force response: The Constabulary is committed to providing a high standard of professional and compassionate care, in particular to victims and witnesses, and those who are vulnerable. The Victim and Witness Hub provides emotional and practical support to victims or witnesses to a crime in Cambridgeshire and Peterborough, to help them cope and recover from the impact of crime. It offers support to victims from the time of the offence, through any subsequent police investigation or court proceedings and beyond, according to the needs of the individual. The force works together with Independent Domestic Abuse Advisers (IDVAs) and Independent Sexual Violence Advisers (ISVAs) who provide tailored support to the individual needs of victims and survivors of domestic abuse and

serious sexual offences. Support can also be accessed through The Elms Sexual Assault Referral Centre (SARC) which offers a range of multi-agency support services and practical help to anyone who has experienced sexual violence or sexual abuse either recently or in the past.

With specific reference to ensuring information on the protected characteristics of victims is accurately and consistently recorded; the Constabulary is committed to improving outcomes and support for all victims, including those from vulnerable groups and those in hard to reach communities where there may be a disproportionate level of violence. Data quality is subject to ongoing scrutiny and oversight so that we can better support victims and understand how to encourage greater reporting, engagement and confidence in the police response.

The other short- and medium-term steps set out by HMICFRS to achieve this recommendation are addressed to other policing bodies in the first instance. The Constabulary will await further information on progress against these to inform our ongoing work to tackle VAWG offences.

4. 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 recommend:
 - 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: 1) 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; 2) the use of the Domestic Violence Disclosure Scheme; 3) 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); 4) the identification and management of high-harm violent offenders against women and girls (in partnership with other organisations); 5) the identification and protection of the most at-risk victims of violence against women and girls offences (in partnership with other organisations); and 6) 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.
 - 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. We recommend:
- 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.
- 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.
- 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.
- 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.

Force response: The Constabulary is developing a plan that will set out the overarching approach to responding to violence against women and girls. The plan will sit alongside our existing Vulnerability strategies that include (but are not limited to) VAWG offences and build on a wide range of actions that the force is taking to prevent offences from occurring, continuing or escalating. Four bespoke projects are currently underway to review and enhance: 1) our Child Abuse Investigation and Safeguarding Unit and the response to child sexual abuse and

exploitation; 2) the response to Domestic Abuse; 3) our Public Protection Unit and the management of high-harm offenders; and 4) our Rape Investigation Team and the response to serious sexual offences. The force has also worked with partners to secure investment from the third round of the Government's Safer Streets Fund to make a positive difference to increase the safety of public spaces. There are robust leadership and governance arrangements through our Vulnerability Performance Group to ensure continuous improvements across these strands and the wider VAWG plan.

The other short- and medium-term steps set out by HMICFRS to achieve this recommendation are addressed to other policing bodies in the first instance. The Constabulary will await further information on progress against these to inform our ongoing work to tackle VAWG offences.

5. Recommendation 5: Immediate review of use of outcomes 15 and 16 in violence against women and girls offences. We therefore recommend that:

- 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.
- 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.

Force response: The Constabulary has undertaken specific work to review the use of outcome 15 (where the suspect was identified, but evidential difficulties prevented further action), outcome 16 (where the suspect was identified, but the victim did not support police action), and evidence-led prosecutions. The force has a Domestic Abuse Scrutiny Group and Rape Scrutiny Panel to allow for open and transparent scrutiny of cases to identify areas for improvement, in particular where a decision to take no further action has been taken by the police or Crown Prosecution Service (CPS). In response to learning identified the force has introduced a No Further Action (NFA) rationale for force-wide use to improve gatekeeping decisions and ensure consideration is given to evidence-led prosecutions where possible. The Constabulary is also developing a Survivor Feedback Panel to ensure we actively seek and respond to the voices of victims and survivors; and use this information to adapt our approach to investigations.

The short- and medium-term steps set out by HMICFRS to achieve this recommendation are addressed to other policing bodies in the first instance. The

Constabulary will await further information on progress against these to inform our ongoing work to tackle VAWG offences.