

APCC update on the 'Police perpetrated domestic abuse: Report on the centre for women's justice super complaint'

Introduction

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. HMICFRS, The College of Policing and the IOPC jointly investigated CWJ's concerns. They released their findings on 30 June 2022. The report's findings are reassuring in some respects as it found examples of good practice when a police officer or staff member is accused of domestic abuse but there needs to be a recognition that the police response to domestic abuse, across the board, still needs to improve. As the report highlights that it is concerning to find the same common weaknesses identified in other reviews of domestic abuse investigations are occurring in these cases. For example, these cases seem just as likely to be closed without all lines of enquiry being pursued, if a victim does not support an investigation.

The report contained one recommendation that related to Police and Crime Commissioners (PCCs) which fell under recommendation 3: To 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."

The recommendation for PCCs [3a] is as follows:

"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".

In accordance with the above recommendation, the APCC was asked by the College and HMICFRS to provide a summary of response from all PCCs, PFCCs and Deputy Mayors. Each areas was asked to share an update on their work in dealing with the specific risks and vulnerabilities of PPDA victims. They were asked to provide details on intended actions / actions that have already been taken, any reasons if no action is being taken and if the recommendation had not been accepted to provide details why.

This report will outline key themes and areas of concerns highlighted by PCCs, PFCCs and Deputy Mayors in the update they provided in response to the report. **All 43 responses confirmed they have accepted the recommendation in the report.**

Key themes

This section of the report will analyse the response submitted by the 43 PCCs, PFCCs and Deputy Mayors to identify the key areas and themes.

Reassurance

When conducting the analysis, it became apparent that many of the PCCs, PFCCs and Deputy Mayors would be **contacting their existing service providers to seek reassurance and reviewing the current provisions they provide** to ensure they are delivering on the areas the recommendation highlights. Examples of responses are below.

- In **Cambridge** to ensure local providers are capable of dealing with the specific risk and vulnerabilities of PPDA victims the Police and Crime Commissioner is arranging an engagement event with local providers. This event will enable any concerns to be captured, potential gaps in knowledge to be identified and plans put in place to address them.
- **Cleveland** OPCC wrote out to all of the service providers to seek assurance that the local services were capable of dealing the specific risks and vulnerabilities of victims of PPDA.
- The **Dorset** PCC will liaise with our service providers to seek reassurances that they can provide support to victims of PPDA.
- **Essex** OPCC will review the services delivered and commissioned by the PFCC to provide assurance that they 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.
- To ensure current service providers are catering for the needs of PPDA victims **Kent** PCC will have further direct engagement with victim support service who provide services for Kent to ensure specific tailored support for victims of PPDA, and the assurance of confidentiality in these sensitive cases.
- **Nottingham** PCC has contacted local commissioned domestic abuse support services and requested information about whether they are receiving police perpetrated DA referrals; if they are fully able to manage the specific risks and vulnerability of those survivors; and whether they fully understand the police complaints and disciplinary system.
- **Durham** PCC in order to gain a better understanding as to the extent of victims of PPDA, the OPCC has included it as a question in the performance monitoring data requested from the specialist commissioned domestic abuse provider as well as all other commissioned services supporting victims of crime.
- **Leicestershire** PCC will conduct a review of the PCC commissioned Domestic Abuse services to ensure they are fit for purpose to deal with PPDA. A review will also be taken of Commissioned services to ensure the appropriate protocols are in place to ensure any residual risk are mitigated at the earliest opportunity.
- **Dyfed-Powys** as a commissioning body have already completed some work with providers to ensure they have direct access to 'Bad Apple' and similar reporting mechanisms through Professional Standards department (PSD). The OPCC have shared guidance with them regarding abuse of police power and trust, encouraging them to report anything of concern.
- **Humberside** OPCC are in the process of engaging with their network of providers to ensure that appropriate sensitive referral routes can be identified for those that may be found to be perpetrators of DA and police officers.
- **Kent** OPCC indicated in their response that whilst they believe the current contract and delivery caters for the victims of PPDA, the OPCC will have further direct engagement with victim support service who provide services for Kent to ensure specific tailored support for victims of PPDA, and the assurance of confidentiality in these sensitive cases.
- **Suffolk** OPCC are currently discussing with local providers the extent to which the support they offer can cover the needs of PPDA victims.
- **Sussex** OPCC indicated in their response that they have the necessary measures in place to deal with PPDA complaints, they note that. Arrangements have been put in place with a local service provider to have a confidential referral pathway for police officers who are

experiencing domestic abuse or where a police officer is accused of being a perpetrator of domestic abuse.

- **West Midlands** PCC will through their Victims Commission – seek the views of the PCCs expert advisory body to make an assessment as to the nature and scale of PPDA in the West Midlands region. They will consider the findings and what the additional support needs of this cohort of DA victims are and consider if a more bespoke measure is required.
- When **Northamptonshire** OPCC asked for reassurance from local providers on specific support for Victim of PPDA it was identified that victims are not routinely referred for support as with other victims of DA. They proposed several actions to ensure support is in place.

This action is more widespread amongst PCCs, PFCCs and Deputy Mayors but the above provides an example of just some of the work PCCs are doing in order to tackle PPDA through a review of their current provision

Holding to account

While the IOPC were tasked with recommendations in terms of monitoring the progress of forces, the APCC recognised that some of these recommendations overlapped into PCCs' responsibilities of scrutinising their Chief Constable, and therefore key actions being undertaken by PCCs, PFCCs and Deputy Mayors as a result of the recommendations in this report are in relation to ensuring the local police force are delivering on the needs of PPDA victims. This can be done by holding the Chief Constable to account which is a key statutory responsibility of any PCC, PFCC and Deputy Mayor. Similarly, it can be done by liaising with internal force departments such as the Professional Standards Department. PCCs provided a number of examples where they have exercised this governance role to ensure that their forces are providing the best possible service to meet the needs of victims of modern slavery.

- In **West Yorkshire** the Mayor and Deputy Mayor for Policing and Crime dedicated a bilateral meeting to discuss the Super-Complaint PPDA report with West Yorkshire Police. In addition, we have been provided with reassurance that West Yorkshire Police can appropriately support victims of PPDA and investigate the incident. The police are also taking steps to improve confidence and faith in the investigation and in their professional standards disciplinary decision-making process in relation to police complaints and misconduct allegations linked to VAWG (including Abuse of Position for Sexual Purposes).
- **Staffordshire** PCC intends to take action and hold the force accountable by continuing to review the actions taken by the force in response to the recommendations of the report as part of ongoing accountability and performance assurance programme.
- **Northumbria** PCC noted they will hold Northumbria Police to account on the Chief Constable recommendations made by the findings report to ensure progress is made. Northumbria's response to PPDA and the recommendations will feature in their scrutiny meetings with Northumbria Police.
- The **North Wales** PCC holds quarterly meetings to scrutinise Professional Standards. The PPDA report was discussed at the most recent Board meeting, and he was assured that the Force have taken steps required so that the Chief Constable can respond to the recommendations made to Chiefs. PPDA will continue to be an area of focus at future meetings of the PSD Scrutiny Board so that the PCC can be satisfied the Force are doing all that they can to support victims of PPDA.
- **Devon and Cornwall** PCC will ensure the force's progress against the recommendations for Chief Constables, including requesting a report from the Chief Constable on the key findings and planned actions resulting from the force's PPDA audits.

- **Essex** PCC will use Quarterly meetings with Police Professional Standards Department to receive information on the force handling of complaints and conduct matters which involve PPDA to ensure adequate oversight and handling is taking place.
- **Hertfordshire** PCC is committed to holding the force to account regarding implementation of the recommendations tabled by the report. An initial report has been received by the PCC, which gives an update, action plan and timescales in relation to each of the recommendations.
- **Lancashire** PCC will hold the force to account in delivering the recommendations outlined in this report by monitoring the force's handling of PPDA complaints through the accountability board mechanism.
- **Gwent** PCC will work jointly with Gwent Police to progress this recommendation further to ensure any domestic abuse support services that is currently in place in Gwent is able to provide the necessary support to victims whilst they are engaging with the police complaints system.
- **Gloucestershire** PCC held conversations with the force and reviewed force policy and the range of support listed within. The PCC is content with the current provision of both local and national support services that include staff associations.
- **Surrey** PCC held discussion with the force and have been informed of progress made and continuing to be made by Surrey Police in response to the CWJ super-complaint.
- To ensure correct oversight the **West Mercia** PCC holds a formal quarterly performance meeting with the head of professional standards. The data reviewed includes the number of conduct cases relating to the abuse of authority for a sexual purpose, DA etc, which are reviewed for trends and emerging issues.

Training for officers and staff

Another common theme expressed in the responses by PCCs, PFCCs and Deputy Mayors was the desire to undertake **further training for officers and staff**.

- **Durham** PCC is going to work with the force and experts to identify additional training which can be delivered to our services that support victims of PPDA. This will hopefully lead to an improvement in the services commissioned.
- **MOPAC** stated that the MPS is rolling out training – built on the feedback from women in the service - to ensure all officers and staff actively intervene and challenge inappropriate behaviours; and a leadership programme focused on improving the skills to lead inclusive and high performing teams. Through its oversight of the MPS, MOPAC will monitor the progress and impact of this training.
- **South Wales** PCC has indicated actions that are due to be taken, they note that information from the report will be used to facilitate a multi-agency learning event taking account of lessons learnt from recent and nonrecent cases and will include aspects about needs of victims and associated risk perceived and the multi-agency responses. It will also be utilised to facilitate conversations with service providers to address any barriers to reporting and the perception of being non-equal partners.
- **South Yorkshire** are holding internal talks with force leads and this has indicated it would be useful to offer some training/briefing to support services on how PPDA is investigated by the Force both in terms of criminal prosecutions and misconduct proceedings, so supporter services are aware and able to reassure victims.
- **Staffordshire** PCC has noted that officers and staff have received training on PPDA and PPSA via the 'Know the Line' input and further awareness raising in planned via the Force Intranet and Access Boards located throughout the police sites.
- **Northumbria** PCC as a result of the recommendations outlined in the report will work with local support services to assess understanding of the issues and identify training needs relating

to PPDA victims and the police complaints and disciplinary system. Where gaps are identified, explore they will if local training for practitioners who work with victims of domestic abuse could include training on the vulnerabilities and needs of PPDA victims, and how to support victims to navigate the police complaints and disciplinary system.

- **Derbyshire** PCC highlighted that where complaints are raised by victims these are addressed and relevant learning coming from the case is applied where necessary.

Funding

The vast majority of PCC, PFCC and Deputy Mayor responses indicated and highlighted they **funded and commissioned services in their local area** that are able to deal with victims of PPDA. The examples below highlight a few of the responses and what they are funding / commissioning.

- **Greater Manchester** Deputy Mayor's office indicated their Multi-Crime Victim Support Service is currently being recommissioned. They have noted that they are able to provide confidential provision to nonpolice and police victims of PPDA.
- **Hampshire** OPCC has worked with the force to commission a Police Independent Domestic Violence Advisor. The Police IDVA is provided by a local commissioned Domestic Abuse service provider. The Police IDVA was recruited in May 2022 to support both victims of PPDA and serving officers and staff who are victims of DA.
- **Cheshire** PCC currently funds in response to Domestic Abuse IDVA's/ISVA's these are trained and accredited staff who understand the risks and complexities victims in this area face and are able to provide effective support.
- **Devon and Cornwall** PCC prior to the publication of the report had already identified a need for a specialised offer to support police officer and staff victims of domestic abuse who experience this form of harm but feel inhibited in accessing support because of their professional status. Funding has been allocated to meet this need through our delivery partner Victim Support.
- **Lancashire** PCC is confident the service commissioned locally – 'Lancashire Victim Services (LVS)' - is able to support victims of police perpetrated domestic abuse appropriately. Moving forward, the PCC will work with LVS to ensure the PPDA guidance issued by the MoJ is fully understood by the IDVAs, they are appropriately supported to carry out their role in relation to these victims.
- **MOPAC** have detailed the provisions currently in place noting that the MOPAC VAWG team who hold commissioning responsibility for domestic abuse are working with providers to support them to collaborate with the DASO and agree how best to embed the work of the unit.
- **Bedfordshire** OPCC indicated that Bedfordshire Victim Care Serve (BVCS) that is funded by the PCC are set up to help around PPDA, we tend to have self-referrals in rather than referrals in. BVCS can advise around the complaint procedures as the team have knowledge of this.
- **Thames Valley** OPCC noted that the PCC has commissioned many services to support victims of crime across the Thames Valley which are set up to deal with PPDA complaints.
- **Warwickshire** PCC will continue to fund and co-commission high-quality support services for victims of domestic abuse. This ensures a holistic approach to domestic abuse that has victims and survivors at the centre ensuring they are supported, and each individual's specific needs are met.

Local services

The recommendation outlines that PCCs need to consider 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.

- When conducting their response to this recommendation **Avon and Somerset** PCC note there are no bespoke services, nor defined pathways available for victims of PPDA across the force area. These findings appear to be echoed nationally. However, nationally established services are providing the support to PPDA victims alongside DA victims.
- **Hampshire** PCC states that the OPCC has started to and will further consult with providers on the complexities for them around supporting a victim of PPDA and what opportunities or limitations there are to the interventions and support they can offer so that improvements can continue to be made.
- **North Wales** PCC admits that whilst some victims have received good support from the Force and our commissioned services, it is clear that some victims have been let down and more could, and should, have been done to support them.
- **North Yorkshire** PCC notes that although there is not currently no formal policy in place, in practice there are a number of measures agreed with North Yorkshire Police which can be taken in such case.
- **The City of London's** Chair of the City of London Police Authority Board will continue to work closely with the City of London Police and Community Safety colleagues who commission these support services, to ensure that the provision of domestic abuse support and policing practice more widely in this area is strengthened and based on the needs of victims.
- **Cumbria** OPCC indicated that through its contract management of support services commissioned for DA victims, the OPCC will have a focus on how prepared the service is for dealing with the specific risks and vulnerabilities of PPDA victims and how they are providing or would provide support. Where further work is needed, actions will be agreed with individual services or as a partnership.
- **Lincolnshire** PCC noted that the following is already in place which addresses the recommendation, Victim Lincs is the initial point of contact and provides support to victims of crime in Lincolnshire. The service is delivered through the OPCC which is completely independent of Lincolnshire Police. Victims are able to self-refer without the need to police report.
- **In Wiltshire** the provision of domestic abuse support services is tailored to individual circumstances - Wiltshire and Swindon services are placed in partnership with other local statutory and non-statutory partners so that service provision benefits from combined local expertise and is part of partnership governance frameworks. This approach increases transparency across service delivery and improves opportunities for victims to access specialist support where needed.