

Tees Valley Inclusion Project Super Complaint: How the police respond to victims of sexual abuse when the victim is from an ethnic minority background and may be at risk of honour-based abuse

National Police Chiefs' Council (NPCC) response to recommendations

1. PURPOSE AND INTRODUCTION

- 1.1. This paper provides a response by the NPCC, on behalf of policing, to the HM Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS), College of Policing and Independent Office for Police Conduct (IOPC) super-complaint report, ***How the police respond to victims of sexual abuse when the victim is from an ethnic minority background and may be at risk of honour-based abuse*** published on 16 December 2022.
- 1.2. What follows is an overview summary of the responses received from the 43 forces in England and Wales to each of the relevant recommendations from the report.
- 1.3. The NPCC welcomes the opportunity to provide the formal response on behalf of policing to addressing these recommendations.

2. BACKGROUND

- 2.1. HMICFRS, the College of Policing and IOPC collaborated on the investigation of a super-complaint made on 26 August 2020 under s.29A of the Police Reform Act 2002 by the Tees Valley Inclusion Project detailing nine alleged key failures in police responses to reports of sexual abuse within the Black and Minority Ethnic community.
- 2.2. The subsequent report made a total of five recommendations, of which four directly required a response from Chief Constables and NPCC. This document specifically covers the following four recommendations:

Recommendation 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.

Recommendation 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:

- a. 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.
- b. independent advisory groups or equivalent groups reflect these demographics.
- c. 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
- d. 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 re-traumatisation that victims of sexual abuse from different ethnic minority backgrounds may experience.

Recommendation 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;
- The use of interpreters; and
- 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.

Recommendation 5: To all those subjects of recommendations. Advise HMICFRS, the College of Policing and the 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.

- 2.3. The NPCC Strategic Hub engaged with all 43 forces in England and Wales, requesting that all indicate whether or not they accepted recommendations 1, 2 and 3. All 43 forces accepted the recommendations. These responses are reflected and summarised in the following sections. Further to this the NPCC also received responses from the Ministry of Defence Police (MDP), British Transport Police (BTP) and National Crime Agency (NCA). These responses are not referred to in the report but will be shared with HMICFRS.
- 2.4. The NPCC received a total of 46 responses: all 43 forces in England and Wales as well as BTP, MDP and NCA.

3. RESPONSES SUMMARISED BY RECOMMENDATION

- 3.1. The following is a summary of comments received in response to the individual questions within the consultation:
- 3.2. **Recommendation 1: The Risk of honour-based abuse – accepted by all forces.** 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.

Response:

- 3.2.1. All forces have either conducted, or are in the process of conducting, a review of all relevant policies.
- 3.2.2. A handful of forces have updated their sexual abuse policies to specifically include an entry highlighting the risk of honour-based abuse since the publication of the super-complaint. Those forces which have not updated policies have reviewed and given a commitment to do so. Two forces do not have a standalone policy for Sexual Abuse and direct employees to follow APP and have stressed they will ensure internal guidance directs employees to view revised version once updated by the College of Policing.
- 3.2.3. Several forces have standalone Honour Based Abuse policies or Standard Operating Procedures which aim to outline best practice response from initial contact to referrals and Investigation. These policies are also being reviewed considering the super-complaint findings.
- 3.3. **Recommendation 2: Cultural Awareness – accepted by all forces.** 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 re-traumatisation that victims of sexual abuse from different ethnic minority backgrounds may experience.

a) 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.

Response:

3.3.1. All forces are aware of the importance of understanding the communities they police, however there is variation in the maturity of the plans and processes in place to improve understanding. A handful of forces have outlined they are in the development phase to improve demographic and cultural data as it not always available and is inconsistent across force areas.

3.3.2. Several forces have commented on the use of neighbourhood policing profiles to support staff in understanding the demographics of their policing area. These are updated using techniques such as geographical scanning, census information and information provided from community teams. Many of these plans are then shared with the wider workforce, predominantly through the force intranet.

3.3.3. Many forces referred to training activity and extra resourcing to assist officers to understand the communities they police and understand cultural nuances. This was both in terms of specific inputs and ongoing activity as part of courses for new entrants such as student officers and CPD for existing officers and staff. Areas of note include the following:

- Implementing Inspector and Sergeant training days with the package put together by researching local ONS data and breaking down ethnic groups and understanding cultural and religious links.
- Undertaking cultural intelligence leadership training which is 'the capability to relate, work and function effectively in a variety of culturally diverse' situations.
- Delivering force wide training on Cultural Awareness which will be refreshed in 2023
- Providing training to all officers at various stages of their careers in respect of honour-based abuse, including a two-hour training session specifically on honour-based abuse and female genital mutilation during the Police Education Qualification Framework entry route.
- Investing in training courses delivered by a national charity supporting victims of honour-based abuse and forced marriage.
- Carrying out regular inputs by subject matter experts and continual CPD development
- Investing in 5 new PCSO roles, which are focused on diversity and equality, and will work to develop relationships and understanding of local communities and link in with neighbourhood teams.

b) Independent advisory groups or equivalent groups reflect these demographics.

Response:

3.3.4. Most forces referred to independent advisory groups or equivalent groups (IAGs). Some forces have identified further work needs to be carried out to ensure IAGs are representative of the local community and to ensure they cover the whole force area. One force highlighted they do not currently have an IAG which was considered but not progressed on the basis of several actions would be duplicated by the Police Race Action Plan.

3.3.5. Many forces have local and diverse IAGs or equivalent groups with the aim of that group reflecting that particular community demographic. One force in particular highlighted diverse IAG membership which is made up of approximately 44% Black and Minority Ethnic representation as well as strong links to key community based voluntary organisations who serve the BME communities.

c) 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

Response:

3.3.6. The majority of forces have referenced ongoing work by their Community Engagement and Neighbourhood Policing Teams who link in with local communities to ensure local response plans are detailed and up to date to serve the local demographic. One force has highlighted it has volunteered to be an “Icebreaker” force for the NPCC with regards to testing new ideas to engage black communities, with the objective of building understanding, trust, and confidence. A further force emphasised each region across the force area has a designated PCSO, with part of their role to engage with communities of different cultures and religions. Those forces who have highlighted the use of neighbourhood policing profiles ensure these are available to access for all staff online. Forces again highlighted how neighbourhood policing profiles are created and kept up to date as detailed in 3.3.2.

3.3.7. Some forces stressed the importance of training and development in this area to keep staff well informed. Training has been delivered to frontline officers by both Community Cohesion Teams, Diversity, Equality and Inclusion Teams and online training packages. Two forces highlighted a gap in this area and outlined they will be seeking to improve the training provisions available.

d) investigations consider any extra factors that might be relevant because of the culture and background of the victim or suspect.

Response:

3.3.8. The majority of forces referred to the training provided to staff and review of relevant policy and procedures; specific areas of good practice are highlighted below:

- If cultural background is relevant to an investigation, then the officer must use the services of a member of the IAG as a critical friend.
- Introduction of a regular peer review programme which looks at the ethnicity of the victim and suspects as one of the elements and whether they have been treated fairly and with respect regarding and protected characteristics.
- Development of a service level agreement with a Forum of Faith who will be able to provide live time tactical advice to Incident Commanders and Senior Investigating Officers of any incident which is serious enough to have an impact on the community, victim, or any interested party. This will be done to take on board faith based advice to enable the force to weave in any relevant considerations and sensitivities into their response.
- Tri-force collaborative work in conjunction with a university to improve response to ethnic minorities who are victims of violence against women and girls offences.
- Dedicated training events for VAWG, Domestic Abuse and Rape and Serious Sexual Offences investigations to ensure investigators are aware of any additional factors that may impact on the victim’s experience.
- Honour Based Abuse and Rape and Serious Sexual Offences single points of contact working across the force area. These points of contact are across both PIP 1 and 2 Investigators.

- Enhancement of the Victim Needs Assessment to specifically cover culture and background of each party to be considered as part of the investigation.

3.4. Recommendation 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.
- The use of interpreters; and
- 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.

Response:

3.4.1. The majority of forces highlighted there are gaps within data collection and consistency in line with the standards outlined in recommendation 3. However, all forces are taking steps to improve the recording of ethnicity data and consistency in this area.

3.4.2. Most forces outlined the adoption of the national Violence Against Women and Girls Strategy with some forces highlighting the improvement of data through the VAWG action plan.

3.4.3. The collection of data against the 3 points highlighted in the recommendation vary across forces. Most forces do not currently collect data on the use of interpreters, with some highlighting this has been hindered by IT systems. Steps such as sending guidance to officers to highlight this area in "free text boxes" on logs with one force going further and utilising Power Bi to capture when interpreters are used within the custody and voluntary interview environment have been implemented locally in some forces.

3.4.4 Many of the forces are improving the governance structures in place to oversee data collection with one force highlighting the creation of a Data Quality Board, chaired by the Deputy Chief Constable to address quality issues.

3.4.5 The NPCC's diversity, equality and inclusion co-ordination committee is working on a data standard recommended to be applied to all operational policing systems. The result being national consistency in data sets, aligned to ONS and the Workforce data standard. The committee are in the process of working out the implications for system changes to present this information with the Standard to Chief Constables. The issue of proportionality is recognised and the recommendation to Chiefs Council will be that the next phase of this work should be the development of operational guidance, e-learning – to cover the 'WHEN' and 'HOW' to collect this information. However, this work does not currently touch on the use of interpreters or the offering of special measures. The NPCC will consider the findings of this investigation and identify if/where further work is required.

3.5. **Recommendation 7: To all those subjects of 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.

Response:

3.5.1. All those subject to recommendations have accepted the recommendations made to them. The collated responses of all 43 Home Office forces in England and Wales will be shared with HMICFRS.

4. CONCLUSION

4.1. It has been demonstrated that forces have made progress in reviewing and addressing the recommendations made by the HMICFRS in relation to the Tees Valley Inclusion Project Super-complaint - **How the police respond to victims of sexual abuse when the victim is from an ethnic minority background and may be at risk of honour-based abuse.** However, it is recognised improvements are still necessary to achieve consistency across all forces, particularly around the collection of data.

Martin Hewitt QPM
Chair, National Police Chiefs' Council

Appendix – Forces that provided responses to the request for information:

- Avon and Somerset
- Bedfordshire
- British Transport Police
- Cambridgeshire
- Cheshire
- City of London
- Cleveland
- Cumbria
- Derbyshire
- Devon and Cornwall
- Dyfed-powys
- Dorset
- Durham
- Essex
- Gloucestershire
- Greater Manchester
- Gwent
- Hampshire
- Hertfordshire
- Humberside
- Kent
- Lancashire
- Leicestershire
- Lincolnshire
- Ministry of Defence
- Merseyside
- Metropolitan Police Service
- National Crime Agency
- Norfolk
- North Wales
- North Yorkshire
- Northamptonshire
- Northumbria
- Nottinghamshire
- South Wales
- South Yorkshire
- Staffordshire
- Suffolk
- Surrey
- Sussex
- Thames Valley
- Warwickshire
- West Mercia
- West Midlands
- West Yorkshire
- Wiltshire