

HMICFRS, CoP, and IOPC Report on Police Response to Sexual Abuse Victims from Ethnic Minority Backgrounds and Honour-Based Abuse: Association of Police and Crime Commissioners Response

Purpose

1. The purpose of this report is to provide a summary of the Association of Police and Crime Commissioners' (APCC) response to Recommendation 4 in HMICFRS, College of Policing and the IOPC's (hereafter 'HMICFRS et al') report regarding the abovementioned super-complaint, as well as APCC members' (Police and Crime Commissioners, Police, Fire and Crime Commissioners, Deputy Mayors for Policing and Crime, and Police Authority Chairs – hereafter 'PCCs') response to the report's other recommendations.

Background

2. In August 2020, the Tees Valley Inclusion Project (TVIP), in collaboration with the Halo Project, submitted a super-complaint regarding the police response to victims of sexual abuse from ethnic minority backgrounds.
3. In the super-complaint, TVIP stated that there were a number of features of policing causing harm to these victims, including the overuse of voluntary suspect interviews, a failure to keep victims informed following the report of sexual abuse, and a lack of empathy from the police.
4. To examine these claims, HMICFRS et al then carried out an investigation, which found that:
 - There is a lack of robust data on victim ethnicity, with some officers appearing to choose not to ask victims about their ethnicity for fear of causing offence.
 - Sexual abuse victims aren't receiving a consistently good service, with national reviews corroborating TVIP's claims.
 - Whilst there are some "excellent" examples of effective policing, there is a need for forces to be more aware of the additional pressures and barriers faced some ethnic minority victims of sexual abuse who may be at risk of honour-based abuse (HBA).
5. In recommendation 4 of the report, specifically to PCCs, HMICFRS et al recommend that they 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 [and] 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 [...] to give victims the confidence to report incidents, to feel safe and empowered, and to stay involved in any investigation and prosecution." (pg. 69)
6. The report also contains the following recommendations:
 - **Recommendation 1:** that Chief Constables update their forces' sexual abuse policies to include the risk of HBA.

- **Recommendation 2:** that officers and staff are aware of the demographics of the communities that they serve, and that Independent Advisory Groups (IAGs) or equivalent groups reflect these.
- **Recommendation 3:** that ongoing work such as that being led on through the NPCC Diversity, Equality, and Inclusion Co-ordination Committee and others to develop data standards for recording all protected characteristics should continue.

APCC Response

7. In December 2022, the relevant APCC Portfolio Leads Alison Lowe OBE and John Campion (Joint Leads on Race Disparity, Equality, and Human Rights), Donna Jones and Sophie Linden (Joint Leads on Victims), and Giles Orpen-Smellie (Lead on Transparency and Integrity) wrote to their PCC colleague across England and Wales, asking them or a representative of their office (OPCC) on their behalf to complete an online survey created by the APCC. They were given until the 17 February 2023 to respond.
8. In the main, the survey asked PCCs:
 - If they agreed with recommendation 4 as outlined at paragraph 5 above, and invited them to submit any examples of action they have taken or intend to take with regard to the recommendation.
 - To provide a reason if they did not agree with the recommendation.
 - To provide any further comments or information regarding recommendation 4.
 - To provide any relevant information regarding the report's other recommendations.

Recommendation 4

9. **All 43 PCCs from the territorial force areas in England and Wales accepted the recommendation.**
10. The vast majority of our members took the opportunity presented by this survey to inform us of further work they are doing in this area, detailed as follows, to give victims the confidence to report incidents, to help them feel safer and more empowered.

Working in Partnership

11. A number of OPCCs highlighted how they are working in partnership with local bodies to better understand the needs of victims from ethnic minority backgrounds. For example:
 - The **Essex PFCC** uses the Southend, Essex, and Thurrock Domestic Abuse (SETDA) Partnership and Board to ensure a consistent understanding and approach to domestic abuse across different communities. A recent SETDA partnership annual conference included input from a survivor of HBA.
 - The **Cambridgeshire PCC** has worked in partnership with the Countywide Support Service for Survivors of Sexual Violence to better understand barriers faced by victims accessing services. A 14% increase in victims from Black ethnic minority communities accessing Independent Sexual Violence Advocacy (ISVA) services has been attributed to this work.

Commissioning and Funding Relevant Services

12. A number of OPCCs also reflected how they are commissioning and/or providing funding for various bodies from the third and specialist sector, to better support and engage with victims from ethnic minorities. For example:

- The **Surrey PCC** has continued her office's support for the Surrey Minority Ethnic Forum. The forum is currently running the Trust Project, supporting Black and ethnic minority women who do not wish to engage with other Violence Against Women and Girls (VAWG) services.
- The **West Midlands PCC** in June 2019 helped to launch the HBA/Forced Marriage (FM) helpline, run by a consortia of specialist services.
- The **West Yorkshire Deputy Mayor** commissions victims' services specifically from 'by and for' organisations from the voluntary, charity and social enterprise sector (VCSE) who represent the interests of Black, Asian, Minority and gendered services.
- The **North Yorkshire PFCC** has commissioned the Halo Project - which comes under the Tees Valley Inclusion Project - to provide a range of specialist Illegal Cultural Harms (ICH) Support Services across North Yorkshire and the City of York. Meanwhile, the **Durham PCC** has commissioned the Halo Project to conduct a deep dive into mapping Black and ethnic minority communities within the force area, to help better safeguard ethnic minority victims of domestic violence and sexual abuse.
- The **Merseyside PCC** as part of her Victims Strategy has continued to commission Savera UK, charity which campaigns to eliminate HBA and provide life-saving services to those at risk, regardless of age, culture, sexuality, or gender.
- The **Lancashire PCC** has allocated grant funding to Humraaz – a specialist southeast Asian organisation – to employ an ISVA specifically to work with ethnic minority victims, and also provide support and advice to the wider service.
- The **Derbyshire PCC** has continued to commission Remedi to provide local training to staff on responding to abuse including HBA, enabling them to gain more knowledge around these areas should they work with any service users who have been impacted.
- In **London**, the Mayor and Deputy Mayor for Policing and Crime have overseen an over £2 million investment in specialist services for women affected by harmful practices such as HBA. This has included the implementation of the first London-wide telephone support line for victims and survivors.

Victim and Community Engagement

13. A number of our members also discussed the ways in which they're consulting and engaging with victims, as well as communities more directly. For example:

- The **Dyfed-Powys PCC** has held targeted, facilitated sessions to ensure that representatives of ethnic minority communities are able to share their views on his policing priorities. This included representatives from local mosques. Meanwhile, the **Kent PCC** has promoted his public consultation processes through 'street stalls', and has also made visits to mosques and other places of worship.
- The **Staffordshire PFCC** in 2022 established a service provider forum which meets on a quarterly basis. The forum captures victim feedback about interactions with the Police, CPS and His Majesty's Courts & Tribunal Service (HMCTS) as they traverse through the CJ

process. The information collected is then fed back into the system with an aim to influence change.

- Meanwhile, the **Norfolk PCC** underlined the importance of reaching out to and engaging with vulnerable groups via community policing.

Victims Needs Assessments

14. A number of OPCCs reflected how they are using Victims Needs Assessments (VNAs) locally to inform their work, including the **Warwickshire PCC** and the **Staffordshire PFCC**. A VNA is currently underway in **North Yorkshire** to better understand the needs of all victims, which due to be completed by the end of the financial year 2023/24.

15. In **London**, the Mayor's Office for Policing & Crime (MOPAC) published a Strategic Needs Assessment for Victims in London¹, which formed part of the evidence base for the Mayor's refreshed Tackling Violence Against Women and Girls Strategy 2022-25² that set out his long-term ambition to eradicate VAWG.

Equality Impact Assessments

16. A number of OPCCs also reflected how they are using Equality Impact Assessments (EIAs) to ensure that their work is inclusive. For example:

- The **North Wales PCC** shared his public consultation survey regarding his Police and Crime Plan with local Race Community Stakeholder Groups, after an EIA conducted by his office found there was a low response rate amongst ethnic minority communities.
- The **Cleveland OPCC** in November 2021 conducted an EIA in relation to domestic abuse and sexual violence support for ethnic minority communities. As a result of this assessment process, a pilot project was introduced aimed at strengthening relationships between ethnic minority communities and specialist support services.
- In the **Leicestershire OPCC**, the commissioning team produce an EIA of each service commissioned and request a copy of any equality and diversity policies and any other relevant documentation from interested bidders, which is assessed as part of the procurement process.

Specialised roles

17. A number of OPCCs also highlighted how they have either created specialised roles in their offices, or provided funding for specialised roles within commissioned services. For example:

- The **Cambridgeshire PCC** has funded two ISVAs and an Independent Domestic Violence Advocate (IDVA) post dedicated to improving the support provided to ethnic minority victims of domestic abuse and sexual abuse, enabling a better understanding of the needs of ethnic minority victims who may be at risk of HBA.
- The **West Mercia PCC** has funded a post for an Ethnic Minority Specialist ISVA, as well as providing uplift for the Domestic Abuse IDVA Service with two 'Inclusion IDVAs' who will proactively engage with hidden communities of West Mercia to raise awareness of domestic abuse and support services (including for victims of sexual abuse).

¹ https://www.london.gov.uk/sites/default/files/mopac_victims_sna_final_report_.pdf

² <https://www.london.gov.uk/publications/tackling-violence-against-women-and-girls>

- The **West Midlands PCC** continues to fund a Black, Asian, and Minority Ethnic (BAME) outreach worker in the ISVA/Sexual Assault and Abuse (SAA) service for Coventry. This role is embedded in the Refugee and Migrant Centre (RMC) and supports a number of community groups and organisations to support victims.
- With support of the **Gwent PCC**, Gwent Police has recently recruited a Survivor Engagement Coordinator, whose role is to specifically to engage with survivors of domestic abuse and sexual offences and ensure that ongoing learning is fed into operational practices.
- The **Gloucestershire PCC** has employed a consultation officer within his office, who will ensure that the victim's voice can input into commissioning processes.
- The **Hampshire & the Isle of Wight PCC** commissions a multi-crime support service, within which there is an "honour-based champion", responsible for keeping the team up to date with the latest relevant information. The ISVA service in Hampshire also has specialist workers who have skills and expertise in tackling HBA.

Oversight and Scrutiny

18. A number of PCCs also discussed how they are using their oversight roles to improve engagement with victims. For example:

- The **Kent PCC**, as part of the contract with the ISVA & SV Therapy Services he has commissioned, has developed a delivery plan that includes a requirement to "Explore and implement actions that enable hard to access communities, underrepresented groups, and those with complex needs to understand the availability of support, [and] how they can access and accept that support".
- The **Lincolnshire PCC** requires all services he commissions to demonstrate how they provide a service reflective of the culture and diversity of the force area, and how they provide tailored support. Service providers are held to account in terms of who is accessing their support through review and monitoring of demographic data in contract meetings.
- The **Cleveland PCC** has introduced a new quality and performance framework across all of his commissioned victims' services to ensure they are meeting victims' needs.
- The **Merseyside PCC** monitors progress against the actions laid out in her VAWG plan through her scrutiny mechanisms and regular meetings with the Chief Constable. Forward
- The **Nottinghamshire PCC** going forward will launch her five-year VAWG strategy, which will encompass victims of sexual abuse from ethnic minority communities who may be at risk of HBA.
- The **Warwickshire PCC** will monitor the force's progress on the recommendations outlined above – as well as the Police Race Action Plan, and Operation Soteria - through the force's governance meetings at which the OPCC is represented.

National Resources

19. In terms of national-level resources supporting them to improve engagement with victims, both **Northumbria** and **Lincolnshire OPCCs** reflected how they have referred to the Ministry of Justice's guidance on support of ethnic minority victims, whilst **Lincolnshire** highlighted how they have referred to the APCC Race Disparity Toolkit and the APCC Equality Framework³.

³ <https://www.apccs.police.uk/media/7543/apcc-equality-framework-for-pccs-2021-22.pdf>

Further information regarding Recommendation 4

20. We also invited our members to provide any further information or comments regarding Recommendation 4. The following was provided:

- **Staffordshire OPCC** informed us that Staffordshire University has been commissioned to undertake research reviewing effectiveness of support service provision to ethnic minority communities in criminal justice responses to sexual violence. The aims of the research include developing appropriate evidence-based training materials regarding the needs of victims and survivors from under-represented communities.
- **Avon & Somerset OPCC** underlined the need for capacity building between local and national government in order to improve and develop ‘by and for’ services for victims and survivors from ethnic minority and other marginalised communities.
- In **London, MOPAC** underlined the need to treat HBA as a continuum of VAWG, and expressed their support for the inclusion of HBA as a risk factor for sexual abuse cases.

PCCs response to Recommendations 1,2 & 3

21. PCCs were asked to provide any relevant information regarding the other recommendations in the report (see paragraph 6 above).

Recommendation 1 – force policies

22. With regard to Recommendation 1 on force policies, **Dyfed-Powys OPCC** reflected how the force locally has a bespoke policy for HBA and forced marriage, under their strategic priority to protect vulnerable people.
23. In **Northumbria**, the force has reviewed their sexual abuse policies and are working to ensure that risks and vulnerabilities relating to HBA are clear.
24. In **Staffordshire** meanwhile, 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.

Recommendation 2 – cultural awareness

25. With regard to recommendation 2 on cultural awareness, the Chief Constable of **Dyfed-Powys** has committed to taking action within the force to improve diversity training and awareness-raising regarding religion, culture, and ethnicity.
26. In **London**, the Metropolitan Police Service is building on the success of their ‘Domestic Abuse Matters’ training, to ensure that there is ongoing quality training in the service covering all forms of VAWG, including HBA.
27. In **Northumbria**, the force creates neighbourhood profiles across all areas to capture communities’ demographics, featuring race as well as other protected characteristics. Community Engagement Guides have been developed within the force, providing advice and guidance to staff about potential cultural barriers and etiquette.

Recommendation 3 – data

28. With regard to recommendation 3 on data, in **Northumbria** a revised Rape and Serious Sexual Offence (RASSO) Investigation Booklet was introduced by the force in 2022, which ensures that ethnicity is specifically recorded along with the victim’s first language as well as any interpreter requirements.

29. Meanwhile, the **Hampshire & Isle of Wight PCC** uses demographic data from her commissioned services to understand demand and inform where providers may need to focus their community engagement efforts.