

Sent by email:

Harriet Wistrich
Centre for Women's Justice

16 September 2024

Dear Harriet,

We write to update you on the progress the College and the IOPC has made to deliver its further actions outlined in the [police perpetrated domestic abuse \(PPDA\) super-complaint investigation report](#) (published June 2022).

We published an initial update in November 2022 on the GOV.UK page [responses to police perpetrated domestic abuse: Report on the CWJ super complaint](#). We intend to publish this letter on this page for transparency.

We are grateful to you for sharing your upcoming report *Police perpetrated domestic abuse: Has anything really changed since the 2020 super-complaint* with us. This report provides further evidence of the importance of robustly responding to allegations of police perpetrated domestic abuse. We are clear that members of the police workforce must uphold the code of ethics and meet the very highest standards of professional behaviour. Criminal and misconduct investigations into allegations of PPDA should be carried out impartially, and it is crucial that policing listen, support, and adopt a victim first approach.

In your upcoming report you express concern around our progress to deliver the actions we set ourselves in our 2022 investigation report. We hope this update provides you reassurance of the work in our organisations to deliver those commitments and help ensure policing delivers a robust response to allegations of PPDA.

College of Policing

Updated authorised professional practice

The College has recently updated its authorised professional practice (APP) on domestic abuse with [new and amended content on responding to PPDA](#). The updated APP makes it clear that forces must respond robustly to allegations of PPDA. It says ensuring high standards of behaviour is fundamental to public trust and confidence in the police service.

The updated APP also provides guidance on when it may be appropriate for PPDA allegations to be investigated by an external force. The updated APP says forces should have plans in place to ensure PPDA allegations are investigated by someone with no prior

connection to any of those involved in the allegations. It says it may be appropriate to refer a case for external force investigation when a “truly independent investigator cannot be found in force” or when “victim trust and confidence cannot be secured another way.”

Changes to other guidance documents

As you have detailed in your upcoming report, the College is delivering further guidance with relevance to PPDA:

- In August 2022 the College had [updated guidance on outcomes in misconduct proceedings](#). The updated guidance is clear that outcomes in cases involving violence against women and girls are likely to be severe.
- In January 2024 the College published a new [code of ethics](#) including new [ethical policing principles](#) and [guidance for ethical and professional behaviour in policing](#). The College has also published a [statutory code of practice on ethical policing for chief officers](#). The principles were designed by policing for policing, and they are highly relevant to the response to PPDA. The guidance is deliberately broad to help officers and staff apply it to their work and conduct every day. But officers and staff will need to demonstrate the principles when responding to PPDA. They need to show courage and take responsibility to take the right course of action when they are made aware of an allegation of PPDA. They need to act with respect and empathy when responding to victims of PPDA. They must demonstrate their commitment to public service by questioning, challenging and reporting any unlawful, unethical or unprofessional actions, including abusive or misogynistic behaviours.
- In January 2024 the College [consulted on new authorised professional practice on vetting standards](#). We received over 100 responses to our consultation and are now finalising the APP considering the feedback we received. We acknowledge the call you make in your upcoming report for the vetting APP to advise that allegations involving domestic abuse and misogyny trigger a review of vetting. We expect to publish the new APP by the end of 2024. We would welcome further discussions with you regarding vetting standards when the APP is published.

Curricula and training

PPDA is covered in the ‘public protection safeguarding leaders’ programme (PPSLP). The programme is aimed at those working as public protection and safeguarding leads within force. It is recommended learning for those starting relevant strategic leadership roles. The College is delivering the PPSLP to five cohorts in 2024 and the course is currently fully subscribed. We are considering how we can use the information in your upcoming report to strengthen the course material related to PPDA and we have also updated course materials to align them with the newly updated APP content.

The College also delivers a weeklong course for PSD investigators. This course covers all aspects of investigating allegations of misconduct and the learning will be relevant to misconduct investigations involving allegations of PPDA. Topics covered include making IOPC referrals and procedures around suspending officers under investigation.

New smarter practice

The College also recently published two [smarter practice](#) reports describing approaches taken by Hampshire and Isle of Wight Constabulary to secure trust and confidence in its response to police perpetrated domestic abuse.

Smarter practice reports are an important way in which the College shares learning with policing and encourage forces to implement local practices that address known challenges. The publication of these smarter practice examples is an important step towards taking an evidence-based approach to securing victim trust and confidence in PPDA investigations.

Investigating PPDA workshops

The College and the NPCC facilitated workshops at the VAWG conference in May 2023. Forces with innovative practice identified during the super-complaint investigation shared their initiatives with conference attendees. The sharing and learning exercise enabled knowledge exchange between practitioners across England and Wales.

Independent Office for Police Conduct

IOPC end-to-end case handling review

In February 2024 the IOPC published the [Violence against women and girls: End-to-end case handling review - February 2024](#), a review of police forces' handling of complaint and conduct matters where VAWG was a factor. The review also considered accessibility in each police force reviewed, of the complaints system for victim-survivors of VAWG. The IOPC found a significant lack of cases to review where domestic abuse perpetrated by police officers or staff was a factor. This suggested that police Professional Standards Departments were having difficulty accurately identifying these types of cases because of the way they may be recorded or responded to. This led the IOPC to begin a focused piece of work looking specifically at the police handling of police perpetrated domestic abuse (PPDA) reports.

PPDA project

To provide it with better insight into how forces are responding to reports of PPDA the IOPC surveyed all police forces asking how PPDA reports are identified, recorded, initially assessed and investigated. The IOPC asked for information about the training complaints handlers receive and what support is provided to victim-survivors. The survey has allowed us to obtain up to date information about the current practices in all police forces.

The IOPC then held professional discussions in six police forces to delve deeper into the themes of the survey and the findings of the super-complaint. To identify forces, the IOPC considered a number of factors including geographical spread, size of force and intelligence around the handling of PPDA. We have been encouraged by new initiatives and processes some police forces have introduced to improve the response to PPDA, although it is clear that more needs to be done to improve the victim-survivor experience when reporting, including appropriate signposting to support agencies and positive safeguarding interventions.

We want to work with forces to find solutions to the issues they face in responding to PPDA. The IOPC are developing a report to share the positive practice and new initiatives so that police forces can learn from each other. The IOPC will also be asking all police

forces to satisfy themselves that they have the correct resources, skills and processes in place to effectively respond to PPDA.

Guidance for police forces

The IOPC review and survey work will be used to inform VAWG focused editions of the IOPC's Focus and Learning the Lesson's magazines to be published in the Spring of 2025. Focus provides police force Professional Standards Departments with practical guidance on dealing with complaints, conduct matters, and death or serious injury cases. It supports police complaint handling with the aim of improving standards. The *IOPC Learning the Lessons* magazines help to improve policing policy and practice more widely, by supporting the police service to learn lessons from investigations into complaints and conduct matters.

Guidance for police forces on off-duty conduct was included in the [IOPC's statistical analysis of referrals relating to VAWG](#), carried out to help identify where improvements can be made and provide comparator data for future analysis.

Information for victim-survivors

In September 2024, the IOPC launched an awareness raising campaign, *Know Your Rights*. The campaign aims to raise awareness of the complaints system and help build trust and confidence among victims and survivors of VAWG, and those who support them. Stakeholders working to tackle VAWG inputted into the design and content of the campaign and will help to promote it.

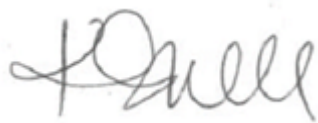
Improving victim trust and confidence in the police response to PPDA, particularly regarding impartiality and case confidentiality

In a previous update we told you that the IOPC had begun a small number of independent investigations involving PPDA, where there are no ongoing safeguarding considerations. Learning from the process of conducting these investigations is now being used to inform discussions about our approach to deciding the most appropriate mode of investigation for PPDA and Rape and Serious Sexual Offence cases, which will be considered by the IOPC Management Board in the Autumn.

Yours sincerely,



ACC Tom Harding
Director of Operational
Standards
College of Policing



Kathie Cashell
Acting Deputy Director
General
Independent Office for
Police Conduct