



OPCC

Office of the Police &
Crime Commissioner
for Gloucestershire

1st December 2021

HMICFRS: Police Response to Violence Against Women and Girls (Final Report)

The report found [here](#) follows the interim report entitled 'Police Engagement with Women and Girls'. This is an important issue and a key focus for me with the subject of 'Violence against Women and Girls' being a priority in my upcoming 'Police and Crime Plan'.

There were 5 recommendations in the report, which are stated in the Deputy Chief Constables response below alongside an assessment of the current position of Gloucestershire Constabulary.

I am happy with the response from the constabulary to the recommendations in the report so far and look forward to seeing their continued progress.

Chris Nelson

Police and Crime Commissioner for Gloucestershire

**Gloucestershire Constabulary**

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Mr Richard Bradley
Chief Executive
Office Police and Crime
Commissioner – Gloucestershire

Our Ref: HMICFRS Police response to violence
against women and girls – Final Report
Email: jon.stratford@gloucestershire.police.uk
Direct 01452 752331
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Date: 22/11/2021

Dear Richard

**Re: Police response to violence against women and girls – Final report
(Interim report was titled - Police engagement with women and girls)**

Please find below our response to the above report, aimed at assisting you to meet the requirements of Section 55(1) of the Police Act 1996.

For the final report updates our previous submission to you of the 19 August 2021. The full list of recommendations has been included for reference purposes, however many of them require activity to be undertaken by other bodies before the Constabulary can act on those outcome's, which will be monitored for any required implementation.

An assessment of the Constabulary's position against the five recommendations for all Chief Constables has been included in the table below.

Please do not hesitate to contact me should you require any further information.

Yours sincerely

**Jon Stratford
Deputy Chief Constable**

Att/.



HMICFRS - Police response to violence against women and girls – Final report

Ref	HMICFRS	Owner	Timescale	Progress
1	<p>Recommendation 1 – Same as interim report</p> <p>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.</p> <p>Recommendation 1.2 – Added not applicable to forces Immediately, the Home Office should add the policing of violence against women and girls to the Strategic Policing Requirement.</p>	<p>ACC Kirk</p> <p>Other bodies Home Office & NPCC</p>	<p>Immediately</p>	<p>Gloucestershire Constabulary has commenced a Gold Group chaired by ACC Kirk to review our approach to VAIWG. The group has a clear terms of reference and risk assessed priorities.</p> <p>The gold group was implemented to capture ongoing national, regional and local work, with police partners and stakeholders.</p> <p>There is also a need to understand the local temperature, feeling and lived experiences in Gloucestershire. This strategy contains a threat assessment, strategic objectives and command structure to give clarity to those engaged in delivery.</p>

<p>Recommendation 1.3 – Added not applicable to forces</p> <p>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.</p> <p>Recommendation 1.4 – Added not applicable to forces</p> <p>By January 2022, the Home Office and the NPCC VAWG National Delivery 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 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.</p> <p>Recommendation 1.5 – Added not applicable to forces</p>			
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<p>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:</p> <ul style="list-style-type: none">• 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;• as part of this: a statutory duty requiring the police and relevant partner agencies to work together to			
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	<p>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.</p>			
<p>2</p>	<p>Recommendation 2 – Same as interim report</p> <p>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.</p> <p>Recommendation 2.1 – Added not applicable to forces</p> <p>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.</p>	<p>ACC Kirk D/Supt Bean</p> <p>Other bodies: Home Office, NPCC</p>		<ul style="list-style-type: none"> • Using a 4 P’s approach the gold group has the following objectives: • Understand the work that is ongoing nationally, regionally and locally, and identify gaps through engagement of this GOLD group. • Understand level of threat in Gloucestershire utilising force data, partnership and third sector data. • Understand feelings and perceptions of women and girls, and men regarding these issues. • Understand work that is ongoing nationally, regionally and locally, and identify gaps. • Support NPCC with unequivocal statements of commitment, and encourage reporting. • Continue to promote and record gender based hate crime, engage with Home Office crime recoding recommendations. • Work with partners to improve safety and perception of safety in public spaces. • Work with partners to improve safety online. • Work with partners and OPCC to maximise funding opportunities.

<p>Recommendation 2.2 - Added not yet applicable to forces</p> <p>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.</p> <p>Recommendation 2.3 – Added not yet applicable to forces</p> <p>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.</p> <p>Recommendation 2.4 - Added not yet applicable to Forces</p>			<ul style="list-style-type: none"> • Investigate and bring perpetrators to justice • Work with education to promote healthy relationships and attitudes. • Carry out a cultural audit / survey in Gloucestershire constabulary to understand the internal threat. • Improve internal culture so all staff feel safe, able to challenge and have the confidence to report. • Pursue perpetrators internally. • Ensure our female colleagues feel educated, equipped and empowered to tackle inappropriate behaviours. • Pursue perpetrators both internally and externally.
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	<p>By March 2022, as part of the work to establish and implement the Government's perpetrator strategy, the NPCC VAWG National Delivery 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 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.</p>			
3	<p>Recommendation 3 – Same as interim report</p> <p>Structures and funding should be put in place to make sure victims receive tailored and consistent support.</p> <p>Added – not yet applicable to forces</p> <p>3.1 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</p>	<p>ACC Kirk / D/Supt Bean</p> <p>Other bodies: MoJ, Home Office</p>		<p>By assessing both the Constabulary approach and the wider partnership landscape, one of the key objectives is to identify gaps in governance, partnerships, policies and procedures. Once completed there will be a further assessment of funding requirements required to support future requirements to provide a sustainable approach to our victims.</p>

<p>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 128 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.</p> <p>Added: 3.2 By March 2022, all police forces should ensure information on the protected characteristics of victims is accurately and consistently recorded.</p> <p>Added – not yet applicable to forces</p> <p>3.3 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</p>			<p>In relation to point 3.2</p> <ul style="list-style-type: none"> • The Constabulary consistently records age/date of birth, gender and ethnicity. • Gender fields are currently limited to male, female and unknown and therefore do not include other self-identified gender forms under the protected characteristics, due to limitations with the Force's core records management system which is due for replacement. • Ethnicity includes the 16 point self-defined ethnicity and the six point defined appearance by the completing officer/staff member. • Home Office Counting Rules (HOCR) do not stipulate that all of the protected characteristic details are required when recording victim information. There are specific fields within a crime record that will cover some of these points, for example, hate crime flag, or vulnerable person
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	<p>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.</p>			<p>marker. These are mandated as part of our Annual Data Requirement (ADR) to the Home Office.</p> <ul style="list-style-type: none"> The sensitivities, timing and practicalities of capturing the nine protected characteristics will need to be carefully considered to avoid alienation and inadvertently causing offence.
<p>4</p>	<p>Recommendation 4 – Added</p> <p>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</p>	<p>D/Supt Bean</p>	<p>Immediately</p>	<p>Gloucestershire Constabulary has commenced a Gold Group chaired by ACC Kirk to review our approach to VAIWG. The group has a clear terms of reference and risk assessed priorities.</p> <p>The gold group was implemented to capture ongoing national, regional and local work, with police partners and stakeholders.</p> <p>There is also a need to understand the local temperature, feeling and lived experiences in Gloucestershire. This strategy contains a threat</p>

<p>be supported in doing so by national standards and data. We recommend:</p> <p>4.1 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.</p> <p>This should include (but is not limited to) improving and standardising:</p> <ul style="list-style-type: none"> • 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; • the use of the Domestic Violence Disclosure Scheme; • the capability of generalist and specialist staff to respond to violence against women and girls offences effectively, including consistent 			<p>assessment, strategic objectives and command structure to give clarity to those engaged in delivery.</p> <ul style="list-style-type: none"> • Gloucestershire have a dedicated Domestic Abuse Safeguarding Team (DAST) These officers provide additional support to victims alongside the Office in Case (OIC) for the investigation to provide updates and engagement with partner agencies, and ensure the best possible wrap-around service for victims. The DAST will facilitate opportunities for victims to receive ongoing support and safeguarding, irrespective of whether they wish to pursue a criminal justice resolution. The Offender Management Team • The management of offenders is undertaken by the Integrated Offender management Team, with the Gloucestershire IOM scheme delivering a multi-agency approach to reducing offences and rehabilitating offenders • The Crime Management and Investigative Standards (CMIS) team are currently running a series of Victims Code workshops, aimed at educating staff of their responsibilities • The force has 'Vulnerability champions' on each Local Policing Area (LPA), who have received enhanced Vulnerability training, and there is an aspiration to further evolve this concept into specific 'Domestic Abuse champions' • The Domestic Abuse Disclosure Scheme is in place and co-ordinated within the Public Protection Unit
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<p>understanding of newer offences (such as coercive control);</p> <ul style="list-style-type: none"> • the identification and management of high-harm violent offenders against women and girls (in partnership with other organisations); • the identification and protection of the most at-risk victims of violence against women and girls offences (in partnership with other organisations); and • 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. 			
<p>Added – not yet applicable to forces</p> <p>4.2 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.</p>	<p>NPCC, Home Office & College of Policing</p>		

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:

Added – not applicable to forces

4.3 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.

Added – not applicable to forces

4.4 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

<p>evidence, information, and evaluation on new and effective ways of working in response to violence against women and girls offences.</p> <p>Added – not applicable to forces</p> <p>4.5 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.</p> <p>Added – not applicable to forces</p>			
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	<p>4.6 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.</p>			
5	<p>Recommendation 5 - Added Immediate review of use of outcomes 15 and 16 in violence against women and girls offences. An unacceptably high number of domestic abuse, rape and other violence against women and girls cases are closed by the police using outcome codes 15 and 16. These numbers vary between forces, and there are significant gaps in the data and information gathered about these outcomes. This makes it impossible for policing to assure itself (or victims) that they are consistently closing these cases appropriately.</p> <p>We therefore recommend that: Added – not applicable to forces</p> <p>5.1 By March 2022, the Home Office should review and refine the data on outcome codes gathered nationally and make improvements in the ways</p>	Home Office & NPCC		

<p>this can be used to identify trends and outliers.</p> <p>Added – not applicable to forces</p> <p>5.2 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.</p>			
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