

The Rt Hon Priti Patel MP
Home Secretary
Home Office
2 Marsham Street
LONDON
SW1P 4DF

11th November 2021

Dear Home Secretary

Police response to violence against women and girls – final inspection report.

As required by statute, I am writing to you to respond to Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) final inspection report entitled, 'Police response to violence against women and girls'.

I, jointly with the Chief Constable, am committed to the importance of achieving progress and tackling Violence Against Women and Girls (VAWG), more so following the publication of the inspection report and recent national cases. To support progress in this area the Chief Constable has recently established a Gold Group on VAWG and abuse of trust. This is a weekly meeting that is also attended by my Deputy Police and Crime Commissioner and Chief Executive. We are also ensuring that all officers and staff members have face to face communication in relation to abuse of trust and codes of conduct.

Further to this, we are also working in collaboration to progress this important area of policing across Wales. The Policing in Wales group has established a temporary taskforce in response to this critical issue. It will ensure that the response across policing in Wales, in collaboration with key partners including the Welsh Government, is swift, co-ordinated and drives the change required. This taskforce will report to the Welsh Chief Officers Group as well as to the Policing in Wales group.

Funding from the police forces and Police and Crime Commissioner's (PCCs) in Wales has been agreed to support the development of the Welsh Government's Violence Against Women, Domestic Abuse and Sexual Violence (VAWDASV) Strategy and blueprint for delivery and a programme of joint work with Welsh Government officials has begun. Senior managers from policing and PCC's offices continue to engage with the consultation process in order to support the shaping and development of the blueprint for delivery.

Rydym yn croesawu gohebiaeth yn y Gymraeg, a phan ddaw i law, byddwn yn ateb yn y Gymraeg – ni fydd hyn yn gohirio ein hymateb. Os hoffech dderbyn gohebiaeth yn y Gymraeg o hyn ymlaen, neu os ydych wedi cael eich gwahodd i gyfweiliad neu gyfarfod ac yr hoffech ddefnyddio'r Gymraeg, anfonwch e-bost at: Commissioner@gwent.pnn.police.uk. Darperir gwasanaethau cyfieithu.

We welcome correspondence in Welsh and where received, we will reply in Welsh - this will not delay our response. If you wish to receive correspondence in Welsh hereafter or if you have been invited to an interview or meeting and you wish to use Welsh, send email to: Commissioner@gwent.pnn.police.uk. Translation services will be provided.

Additionally, PCC's, the police and the health service have agreed to re-model sexual assault services across Wales. A new model has been agreed as have clear quality standards for delivery and funding contributions. The first phase of the re-model is now in its implementation phase and work to design and co-ordinate community services is underway.

As evidenced above, I, as well as my colleagues across Wales, continue to recognise the significance and scale of the issue of violence against women and girls and the role the police service plays. This is re-emphasised by the Chief Constable in her comment below:

I welcome this report from HMICFRS that focuses on the important topic of how effectively the police respond to offences of VAWG.

The report makes a sobering reference to the scale of the crime faced by women and girls. In each case there is a woman or girl who has experienced harm or suffering, and we must do all that we can to eradicate this violence against women and girls, so they are safe and protected in society. Tackling the matter is an absolute priority in Gwent.

Recognising the issue, we have recently set up a VAWG Gold Group chaired by the Deputy Chief Constable. This group is tasked with developing a force plan to tackle the issues, repair trust and confidence amongst women and girls, deliver against the National Police Chiefs Council (NPCC) VAWG strategy and to do all we can to prevent police officers abusing their position. Our plan is currently being finalised and will provide a relentless and robust focus to how we deal with the issue and protect women and girls from violence.

I am pleased the inspectorate has recognised the Victim Care Unit we have in Gwent as notable and good practice. The unit will improve the support given to victims, ensure compliance with the Victims' Code and refer victims to specialist support services when required so that victims are engaged and supported according to their individual needs.

Equally, I am pleased the inspectorate has recognised the progress that policing has made over the last few years in how we respond to VAWG, but we cannot be complacent. We must continue the momentum to enhance and build on these improvements. As noted within the inspection report, policing cannot solve this issue in isolation, and we are fortunate here in Gwent to have strong relations with our partners supported by the Police and Crime Commissioner. I commit to continue building and working in partnership to deliver a system-wide approach to address violence against women and girls.

As part of our work we will consider the recommendations made by the Inspectorate.

As indicated in her comments, the Chief Constable and I remain committed to tackling all forms of VAWG. I have made continued financial and resource investments towards ensuring an effective and sustainable response to victims and survivors. We are proud of the continued partnership work in Gwent that has enabled us to identify and address specific issues, particularly the impact the COVID-19 pandemic had on our criminal justice processes as well as survivors of domestic abuse and sexual violence.

Tackling violence against women and girls and effectively supporting victims and survivors are key commitments within my new Police and Crime Plan. Under the priority 'Combat Serious Crime', I am committed to improving the overall criminal justice response to rape and serious sexual offences. I will also commission and invest in services that work with perpetrators of serious crime to prevent and reduce re-offending. In order to 'Support Victims and Protect the Vulnerable', another priority within my new Police and Crime Plan, I will continue to provide effective services that identify and respond appropriately to the needs of victims through Connect

Gwent and the Victim Care Unit. I will also enhance arrangements with partners to protect the most vulnerable and work towards ensuring that all victims receive timely police investigation updates.

The Victim Care Unit, which I launched with the Chief Constable in July 2021, will act as the central point of contact for victims, supporting them from the point of reporting a crime to the conclusion of the criminal justice process. This complements our existing Connect Gwent offer that provides support to all victims of crime (this was the first victims' hub in Wales) and was commissioned by the OPCC and led by Gwent Police. The new Victim Care Unit has a team of 19 Victim Care Officers working closely with police officers to ensure victims are fully updated on the investigation they are involved in. They also make sure that victims know and fully understand their rights under the Victims' Code, and work with Gwent's Survivor Engagement Coordinator to feed key issues back to Gwent Police to improve outcomes and learn lessons. By providing this targeted support to victims I hope that we can build their confidence in the criminal justice system and help aid their recovery.

I contribute to a range of services within Connect Gwent that are available to women and girls, including:

- A Wellbeing Practitioner (Community Psychiatric Nurse) who will pick up any appropriate referrals, undertake mental health assessments and refer directly into mental health provisions.
- An Older People's Caseworker who will work alongside any of the other services available.
- The Umbrella Gender or Sexual Identity Service which provides support to victims of crime in relation to their gender or sexual identity.
- The Umbrella Service for Children and Young People which provides specialist person-centred support services, such as counselling, to children and young people.

Earlier in my response I made reference to the Survivor Engagement Coordinator post which I fund and which is also based within Connect Gwent. This role was the first of its kind in Wales and was created following a recommendation by my office. Set up to establish a sustainable survivor engagement framework through which survivors of domestic abuse and sexual violence can share their lived experience, this role is helping to ensure a victim-centred approach is at the heart of our response to survivors of these offences.

The Deputy Police and Crime Commissioner attends the Gwent Regional VAWDASV Board, and the Communications and Engagement Team from my office has been instrumental in supporting the Board's awareness-raising and engagement work. My office, Gwent Police, VAWDASV Team and partners work together on co-ordinated campaigns and messaging throughout the year, including Elder Abuse Day and White Ribbon Day. There has been even more activity during the past 18 months during each lockdown, firebreak, or when there was a change in local restrictions. We have also paid for social media posts targeted at people who do not follow our channels to ensure we reach people who would not otherwise see this content. We were also instrumental in getting VAWDASV information into vaccination centres in Gwent, which was critical during lockdowns as this could be the only time a victim may be away from their perpetrator. The VAWDASV Board is represented at the Gwent Criminal Justice Strategy Board, of which I am the chair. This partnership has provided key support and challenge in addressing the COVID-related court issues.

I continue to contribute funding to local support services and have worked closely with partners to ensure the sustainability of these services against the challenges of the pandemic. Such services include:

- VAWDASV sexual violence and domestic abuse services, providing sexual assault, Independent Sexual Violence Advocates (ISVA) and counselling provision for victims. A Gwent-wide Independent Domestic Violence Advocates (IDVA) service is jointly commissioned with Newport City Council on behalf of the VAWDASV partnership and funded by the Welsh Government and my office to provide victim support and advocacy.
- Cyfannol Women's Aid Horizon Support Services, providing adult counselling and ISVA services.
- Cyfannol Women's Aid Older People Service Awareness, providing workshops and awareness raising activity on older people and domestic abuse / sexual violence, support services and local and regional community groups. The service also works with specialist organisations to target older people in more marginalised groups (LGBT+, ethnic minority communities, Carers, etc.) and identifies gaps in service provision while developing a greater understanding of the needs, risks and strengths of older people who have experienced domestic abuse / sexual violence.
- New Pathways provides Sexual Assault Referral Centre (SARC) services, ISVA services, children's therapy and adult counselling.
- BAWSO Outreach Project, provides support for Black, Asian and Minority Ethnic domestic abuse victims; specifically, those who have experienced honour-based violence (HBV), forced marriage and female genital mutilation (FGM) in Gwent. They also provide direct referrals to appropriate agencies in specialist fields.

As part of my commitment to improving how we support victims my team has undertaken an extensive critical review of the way Gwent Police responds to rape and used the findings to inform the Rape and Serious Sexual Offences (RASSO) Action Plan for Gwent. The Chief Constable has welcomed this report and will provide a formal response to my next Strategy and Performance Board. I continue to focus on this agenda through involvement in the Gwent Police's Rape Steering Group and through the Gwent Criminal Justice Strategy Board and the Criminal Justice in Wales partnership.

The Office of the Police and Crime Commissioner and Gwent Police Joint Strategic Equality Plan 2020-24 has provided a clear focus on improving the accurate recording of protected characteristic information for both victims and offenders. This work forms part of a more extensive review to ensure that the data recorded by Gwent Police is accurate, of high quality and used in the provision of effective support to victims.

In addition to the above, I also contribute to intervention and prevention initiatives involving women and girls. I have provided funding to Phoenix Domestic Abuse Service to build on existing provisions and expand delivery of effective interventions to perpetrators of domestic abuse across all five local authority areas within Gwent. The service specifically aims to increase access to provision for those individuals causing harm through domestic abuse but who do not currently fit into current service criteria due to either the type of relationships or the perceived risks.

I continue to provide the Women's Pathfinder Whole System Approach programme, delivered in partnership between Welsh Government, Her Majesty's Prison and Probation Service (HMPPS), South Wales Police and Crime Commissioner and both Gwent and South Wales Police. This aims to reduce offending and reoffending of women in the Gwent and South Wales areas by enabling women and children to have opportunities which allow them to live positive, independent and healthy lives. The project is delivered by Future 4, in collaboration with G4S, Safer Wales and Llamau. The programme is currently being independently evaluated, with the work due to be concluded in February 2022.

As part of our VAWDASV work, we have successfully embedded Operation Encompass in schools within the Gwent Police force area. This initiative sees Gwent Police inform schools of

any domestic abuse incidents that have involved or been experienced by children before classes start the following day, allowing the proper safeguarding support to be put in place.

Linked to Operation Encompass, my office has commissioned Welsh Women's Aid to conduct a piece of research mapping out and evaluating service provision for children experiencing domestic abuse in Gwent, enabling us to understand what is currently available. We are particularly interested in establishing what is offered to children identified as medium risk who have repeat experiences that do not meet high-risk safeguarding thresholds. The research will identify gaps in provision and make recommendations for me to consider in respect of commissioning services and support.

In relation to the recommendations within the report which require a response, please note the following updates:

By March 2022, all police forces should ensure information on the protected characteristics of victims is accurately and consistently recorded

Gwent Police recognises the value in accurately and consistently recording information on protected characteristics and a Chief Inspector has been tasked with working through options to achieve this recommendation.

This was a recommendation that my office also highlighted to Gwent Police when undertaking the critical review of the way the force responds to rape. This review was discussed at my Strategy and Performance Board in June 2021 and as mentioned earlier, the force response to that review is due to be provided at the next meeting. This is an area, as PCC, that I am aware needs additional scrutiny and I welcome the ongoing conversations that are taking place in order to make progress.

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.

This should include (but is not limited to) improving and standardising:

- **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 understanding of newer offences (such as coercive control);**
- **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.**

Gwent Police had commenced this work prior to the recommendation being issued through its VAWG Working Group. This work is continuing at pace and the force is confident of meeting the deadline indicated in this recommendation.

Immediate review of use of outcomes 15 and 16 in violence against women and girls offences.

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.

Gwent Police is placing increased scrutiny around the use of outcomes 15 and 16 that reviews the appropriateness of these outcomes and identifies any learning or practice to continually improve. This is governed in the Vulnerability Meeting. The force will continue to review and scrutinise the use of these outcome codes pending the national process being disseminated by the National Delivery Lead.

As I have stated previously, I support Baroness Bertin's proposed amendment to the UK Government's Policing Bill, which seeks to include domestic abuse and sexual violence within the legal definition of 'serious violence'. This would send an important message that violence of any kind will not be tolerated.

I also look forward to the outcome of the inquiry into the murder of Sarah Everard. The time has come for society to change and this tragic case must now be used as a springboard for a crucial conversation about how we stop all forms of violence against women and girls.

I will now continue to work with the Chief Constable to ensure that Gwent Police's response to crimes involving violence against women and girls is effective and sustainable and makes a positive difference to their experiences.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jeff Cuthbert', written in a cursive style.

**Jeff Cuthbert B.Sc., MCIPD
Police and Crime Commissioner for Gwent**