

### 1. Introduction

Solace Women's Aid was established over 45 years ago and is one of the single largest providers of services for survivors of violence against women and girls (VAWG) in the UK. In 2020/21, Solace supported 1,087 survivors in refuges and accommodation services, 6,937 in community-based services, 5,427 through our advice service and 1,988 in therapeutic services and 359 children and young people in our specialist children and young people services. Our prevention work, through preventative group work with adults and children, professional training and perpetrator programmes, supported 7,663 people in 2020/21. Solace's services are concentrated in London, and as a result, we work closely with the Mayor's Office for Policing and Crime (MOPAC), with MOPAC commissioning pan-London services from Solace.

We welcome the inclusion of commitments to tackling VAWG in this plan and the opportunity to provide feedback, note that a separate strategy to tackle VAWG will be published by the Mayor in the coming months, and that feedback on the draft Police and Crime Plan will be incorporated into the tackling VAWG strategy. We also note the recent tackling VAWG action plan published by the Metropolitan Police Service (MPS), which Solace has also provided feedback on, found here.

In this response, we have reviewed the key commitments relating to VAWG from each of the four themes of the draft Police and Crime Plan, highlighting the commitments strand of the action plan, and provided our comments based on consultation with frontline staff specialising in supporting victims of domestic abuse and sexual violence.

### 2. Summary

Solace welcomes the Mayor of London's commitment to tackling VAWG, through a number of commitments made as part of this plan. In each of the commitments made to address VAWG, it is important that MOPAC assesses the impact on minoritised groups, particularly Black and ethnic minority communities, LGBT+ groups and those with insecure immigration status, to ensure that they will benefit from these initiatives and not be disproportionately disadvantaged, for example through over-policing.

In this response we have provided detailed feedback on the commitments made related to tackling VAWG and recommended additional actions that could be taken to make this plan more effective and to be included in the Mayor of London's upcoming tackling VAWG strategy to better support women and girls. Overall, Solace recommends the Mayor of London to commit to:

- Consulting and working with specialist and those 'led by and for' VAWG sector organisations on the development and implementation of initiatives for victims, including the Victim Care Hub.
- Working with the MPS to ensure they take accountability for the culture within the service which has led to a number of officers abusing their position to perpetrate violence against women, and working closely with MPS to make significant changes needed to better protect women and girls.
- Working with the MPS to commission a specialist VAWG organisation to run an independent advisory service in MPS to support victims of domestic abuse and sexual violence perpetrated by former and serving police officers to help navigate the complaints process.

We encourage the Mayor of London to consider these recommendations when developing his draft strategy on tackling VAWG, and anticipate this strategy to have more detail on the specific actions he will take.

### 3. Reducing and preventing violence

Solace welcomes the Mayor of London's public health approach to preventing violence and supports the prioritisation of early intervention and prevention. The inclusion of making women and girls safer and feel safer as a central part of this strand also shows the Mayor of London's firm commitment to addressing this endemic issue.

There are a number of measures which specifically look at targeting VAWG which Solace supports, including improving the support available to survivors of domestic abuse and their children in refuges and other safe accommodation, promoting learning about positive, healthy relationships and challenging misogynistic attitudes and promoting gender equality. Solace would welcome further information on how MOPAC intends to work with MPS to improve the investigation and detection of VAWG offences, and whether this commitment includes addressing the culture within the MPS which has been reported to be misogynistic, racist and discriminatory against marginalised groups, and therefore not conducive to effectively investigating and detecting VAWG offences. As part of this piece of work, it is imperative to look at how to improve the detection of VAWG offences perpetrated by serving police officers and MPS staff.

Also key to improving investigation and detection of VAWG but missing from this plan is funding for training on domestic abuse and cultural competency. The Mayor of London should consider directing funding for MPS to roll out training on domestic abuse and VAWG that is co-produced and evaluated by VAWG organisations to all frontline officers, civilian staff, Sergeants and Detective Inspectors. In addition, the Mayor of London should provide funding for all MPS staff to receive specialist cultural competency training that accounts for barriers, colloquialisms, languages and customs that make up the diverse Black community (as set out by Sistah Space in their campaign for Valerie's Law).

The commitment in this section of the plan to continue to support programmes to change the behaviour of perpetrators of VAWG is crucial to reducing and preventing crime. Across the London boroughs Solace works in, the provision of perpetrator programmes is inconsistent, with some boroughs having no programmes at all. Of approximately 400 survivors who exited Solace's community-based services in December 2020, only 1% of the primary perpetrators had accessed a programme. Perpetrator programmes tend to be aimed at men with children or men who have been through the criminal justice system, and there remains a gap in service provision for other groups, particularly younger men without children. The commissioning of perpetrator programmes consistently across London is an important way to support people with a history of being violent or abusive to a partner or family member to change their behaviour.

To further improve this section of the plan, the Mayor of London could consider including commitments to:

- Evaluate how the culture in the MPS impacts the way in which VAWG is investigated and detected.
- Direct funding for domestic abuse and cultural competency training to all frontline officers and staff, Sergeants and Detective Inspectors. Commission perpetrator programmes consistently across London and commission programmes which target younger men without children and men who have not been through the criminal justice system.

#### 4. Increasing trust and confidence

The recognition by the Mayor of London that significant work needs to be done by City Hall and MPS to improve trust and confidence in the police and that some officers abuse their trusted position in the police to perpetrate crime is important. However, considering the significant and substantiated concerns about VAWG perpetrated by serving and former police officers, specific reference to this in the plan would help to start rebuilding trust in the police amongst women. In giving evidence to the [London Police and Crime Committee on 20 October 2021](#), Dame Cressida Dick accepted that the MPS can “appear defensive” on occasion. This defensiveness, even on occasion, can impact the support victims of VAWG receive from the police. The commitment by the Mayor of London to work with MPS to encourage greater openness, responsiveness and transparency is important and welcomed. Serious leadership and accountability within MPS at a senior level and by the Mayor of London is needed to take forward the necessary overhaul of the culture and professionalism in MPS.

Improving standards of behaviour is a huge undertaking, and we welcome the review by Baroness Louise Casey. It is important that recommendations are considered fully and implemented quickly and effectively, recognising the risk – particularly to women and marginalised groups – of not improving standards.

We would like to see an explicit commitment in the plan to support the MPS to review all current investigations into allegations of sexual misconduct and domestic abuse against former and serving officers and staff. This will not only improve transparency and rebuild trust, but will help to ensure that people who are not fit to serve in the MPS are swiftly removed from their positions.

Police Me Too, a movement set up to expose domestic abuse by former and serving policemen, highlights a culture within the police and broader criminal justice system that fails women and girls. Solace would recommend MOPAC works with the MPS to commission a specialist VAWG organisation to run an independent advisory service in MPS, similar to the Independent Sexual Misconduct Advisory (ISMA) service that was provided by Solace to the Houses of Parliament in 2018, for expert advice and support. This service should be open to all people working in the MPS or who have experienced domestic abuse and sexual violence by former or serving MPS officers to provide support and advice, including on how to access other services and guided assistance through the internal complaints procedures.

Mistrust in the police is a serious issue, and is particularly prevalent within marginalised groups, like Black and other ethnic minorities, religious minorities, LGBT+ groups and disabled people. This is largely due to historic and current mistreatment and disproportionate discrimination by police and the criminal justice system more broadly, and the over-policing of certain communities creating a culture of suspicion and mistrust. A recognition of this, and the responsibility of the MPS to change it is important, as is specific actions to address this and work with communities collaboratively and not paternalistically.

Solace would recommend the Mayor of London also includes the following commitments in this section:

- Strengthen position and communications to recognise that VAWG is perpetrated by police officers abusing their position and that more needs to be done to address this specifically.
- Support MPS to conduct an urgent review of all current investigations into allegations of sexual misconduct and domestic abuse against officers and staff, including those no longer serving.
- Work with the MPS to commission an independent advisory service by a specialist VAWG organisation within the MPS to provide advice and support for victims of domestic abuse and sexual violence by former or serving MPS officers.

## 5. Better supporting victims

### Improving community-based services

Since the start of the pandemic and the onset of restrictions, levels of domestic abuse in England have increased markedly. Familial tensions were heightened as a result of lockdown restrictions and many women were forced to remain at home in abusive situations. The [Office for National Statistics \(ONS\)](#) reported over 90,000 domestic abuse-related crimes recorded by the police in London alone in the year to March 2021, and an increase overall in England and Wales of 6% on the previous year. As lockdown restrictions eased, Solace saw demand for its services surge. In July 2021, our advice line saw its busiest month since the start of the pandemic, with a 67% increase in demand compared to July 2020. The calls Solace has been receiving since the start of the pandemic are often from women in greater distress and with higher needs, including an increase in suicidal ideation.

With many survivors of domestic abuse never reporting their abuse to the police, community-based services are often the only place some women reveal the abuse they have faced. Solace welcomes the Mayor's commitment to increase the number of IDVAs and ISVAs, which is essential for improving the experiences of and outcomes for victims. Because of the huge surge in demand for these services since the onset of the pandemic, the Mayor of London should consider increasing funding for community-based services including advocacy services, advice lines, helplines and counselling and therapeutic services to ensure all survivors are able to access the help they need.

Advocacy services should be commissioned from specialist and 'led by and for' VAWG organisations who also have knowledge of and experience in working with marginalised groups. IDVAs and ISVAs should be commissioned to work with survivors for longer than 12 weeks, which is a common timeframe for commissioning. With the increasing complexity of needs of women Solace has worked with and the barriers they face, 12 weeks is not long enough and as a result, women are often referred into the service again for further support.

Two women a week are killed by men and a further nine are estimated to die by suicide at least in part because of domestic abuse. Women who have experienced VAWG have poor health and complex mental illnesses, and there is a real gap in trauma-informed specialist mental health services for survivors of VAWG with high mental health needs, problematic substance abuse and complex mental illnesses. Ensuring survivors have access to counselling and therapeutic services is essential for recovery. Solace would encourage the Mayor of London to increase funding for specialist VAWG therapeutic services to provide expert mental health support for survivors.

Marginalised groups, including Black and ethnic minority women and women with insecure immigration status, face barriers to accessing help and support when they are victims of domestic abuse and are less likely to go to the police for help. Solace welcomes the Mayor of London's recognition that the best way to ensure these women can access help without fear is by working with partner organisations to create safe and informal spaces for victims. It is important these partners are specialist 'led by and for' organisations who are rooted in these communities and have an understanding of how best to help these women. More broadly, Solace would endorse victim services for victims of VAWG to be delivered by specialist VAWG organisations, trained and equipped to deal with cases of domestic abuse and sexual violence, rather than by one organisation working with victims of all types of crime.

### Improving how MPS works with victims

The treatment of victims by police and in the criminal justice system needs significant improvement to help victims recover, rebuild trust in the police, reduce victim attrition and improve the number of

prosecutions. Solace welcomes the work of the Mayor of London thus far to improve victim care, including the appointment of the Victims' Commissioner for London and the investment in specialist support services for victims. As noted in the plan, one key issue for victims is the increasing amount of time it is taking for cases to be tried at Crown Courts, leaving many victims waiting for years for their cases to be heard.

One commitment outlined as part of this strand of the plan is for MOPAC to work with the MPS to develop the business case for a Victim Care Hub to better join up and transform the way victims receive support. We would welcome further information on what this might look like and for the opportunity for specialist and 'led by and for' organisations who directly support victims to bring their expertise to feed into the development of the hub. It is also important to look at the impactful things already being done across London to support victims, and how to ensure these are standardised, rolled out across BCUs, funded appropriately and promoted within the MPS and communities. This includes increasing the number of IDVAs and ISVAs, but also looking at increasing the number of these advocates co-located in police stations and improving the understanding within the MPS of the vital role they play in supporting victims through the criminal justice system.

Better policing and criminal justice responses and outcomes are crucial for improving the experience of victims, and we welcome this as a key aspect of this strand. The Mayor of London should consider using his power to fund additional officers for the MPS through the precept to invest in specialist sexual offences investigation trained officers (SOITs) rather than prioritising the number of police on the streets. In September 2019, there were only 179 SOITs across MPS, and in 2021 alone there were over 18,000 police recorded sexual offences in London. SOITs can have a significant impact on improving victim engagement as they have a better understanding of how to investigate sexual offences and can therefore help victims feel supported through the process of reporting, potentially reducing victim attrition.

Victims with insecure immigration status are most at risk, with their immigration status often used as a tool to by perpetrators to level abuse. They also risk immigration enforcement by reporting their abuse to the police due to the data sharing agreements between the Home Office and the MPS. The Home Office has rejected the recommendations made by VAWG organisations and HM Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) to put in place a firewall for migrant victims or suspend data sharing between the police and the Home Office on victims with insecure immigration status. It is important that the Mayor of London lobbies the Home Office to reverse this policy, and works closely with specialist VAWG organisations to support women with insecure immigration status without risking immigration enforcement.

Reducing the number of repeat victims of domestic abuse and sexual violence is imperative, but missing from the action plan to address this is ensuring bail and protection orders are used in more situations where they apply, and that breaches of these orders are quickly and thoroughly investigated. The Mayor of London should commit to holding MPS to account on their use of all legal means available to protect victims, manage offenders and reduce the risk they pose.

The following commitments could also be included in this strand of the plan:

- Increase funding for community-based services including advocacy services, advice lines, helplines and counselling and therapeutic services as a result of an increase in demand brought on by the pandemic.
- Commission community-based services from specialist and 'led by and for' VAWG organisations for longer than 12 weeks to provide sufficient victim support and reduce repeat referrals.

- Provide funding for specialist VAWG therapeutic services to provide expert mental health support for survivors.
- Consult specialist and 'led by and for' VAWG organisations on the design and development of a Victim Care Hub to ensure it is set up to help the widest range of victims as best as possible.
- Review the initiatives already taking place across London which support victims, and ensure these are properly funded and rolled out consistently across London.
- Invest in specialist sexual offences investigation trained officers (SOITs) across the MPS to improve victim engagement and reduce attrition.
- Hold MPS to account on the effective use and enforcement of bail and protection orders and breaches of those orders.
- Assess the barriers in place for victims with concerns related to their immigration status from accessing support for VAWG, and continue to lobby the Home Office its position on not putting in place a firewall for migrant victims between the Home Office and police.

## 6. Protecting people from being exploited or harmed

Solace welcomes the recognition by the Mayor of London of the need to tackle harm that is perpetrated both online and offline. Protecting women and girls from being harmed online is crucial, but not enough is done at either a legislative or an enforcement level to address this. Perpetrators are increasingly using online tools and platforms to harm women, with Black and minoritised women facing disproportionate threats and online violence due to misogynistic racism.

The upcoming Online Safety Bill as it stands will not meaningfully regulate the online harms faced by women and girls, and as such, Solace would welcome the Mayor of London committing to extending his lobbying on this bill to include widening the scope to also address online misogyny and VAWG. Online VAWG should be recognised as a specific harm, and the definition of this should recognise the intersecting ways that abuse can affect different women and girls. Without strong regulations and requirements for social media platforms and technology companies to act, women risk facing serious abuse online with no recourse to justice.

The commitment to work with partners to embed a trauma-informed approach to victims of crime is crucial and, if implemented across the criminal justice system, will help to provide better victim care, improve evidence gathering and increase prosecution rates. As identified in this section of the draft plan, the trauma associated with VAWG can increase the complexity of the needs of victims and, if unmet, can contribute to offending. Cultural competency training, as recommended by Solace in section three of this submission, will also help to protect vulnerable victims.

Effective wrap around services and the Whole System Approach taken by MOPAC and partners to women in contact with the criminal justice system is imperative for protecting vulnerable women and survivors of VAWG, and Solace welcomes the Mayor of London's approach on this.

To strengthen this section of the plan, the Mayor of London could consider including:

- Close partnership working with specialist 'led by and for' organisations to better understand how best to help victims with complex needs and provide funding for rehabilitation support to prevent offending.
- Calling for the Online Harms Bill to address online misogyny and VAWG, and working with VAWG organisations campaigning on strengthening this bill to effectively lobby the Government and technology companies to keep women safe.