

### 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 2019/20 we worked with 27,414 women and children across our services. Solace's services are concentrated in London, and as a result, we work closely with the Metropolitan Police Service (MPS). We welcome the MPS' commitment to tackling violence against women and girls, both in society and internally. In this response, we have reviewed key commitments from each 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 through the criminal justice system.

### 2. Summary

Solace welcomes the MPS' commitment to tackling VAWG, and the recognition in this action plan of the need to address the culture within the MPS in order to tackle VAWG more broadly. Overall, the action plan could have been substantially strengthened with more detail on each of the commitments, what these would entail or how they would be implemented. This would have helped us to evaluate the potential impact of many of the commitments and how well we think they might work in practice in this response. We would welcome the opportunity to work with the MPS to feedback on and support the implementation of more detailed plans.

In each of the four strands of this action plan, Solace found the commitments needed further clarity on what they might mean for victims and survivors of VAWG and that many commitments could potentially have a disproportionate impact on minoritised groups, particularly Black and ethnic minority communities, LGBT+ groups, and those with insecure immigration status. We also found a lack of sufficient recognition for existing initiatives that work well, in particular the roles of Independent Domestic Violence Advocates (IDVAs) and Independent Sexual Violence Advocates (ISVAs) which would benefit from greater investment and more consistent use across BCUs. IDVAs and ISVAs play a vital role in supporting victims through the criminal justice process and improving justice outcomes. Sexual Offence Trained Service Police Officers (SOITs) can also play a significant role in supporting victims of VAWG in reporting the crime in a more sensitive and supported way, which is likely to reduce the risk of victim attrition.

In this response we have provided detailed feedback on commitments in each strand of the action plan how these could be strengthened, and recommendations of additional commitments that could be made in order to make this plan more effective. Overall, Solace recommends MPS to:

- Work with VAWG sector organisations to develop and implement these commitments and better understand the impact they might have and how they can be made more effective.
- Conduct equality impact assessments on new and existing initiatives to understand the potential disproportionality their implementation could have on different minority communities.
- Assess the work that is already being done to tackle VAWG for effectiveness, look at whether improvements can be made and how sufficient the funding for these initiatives is.
- Ensure support for victims is delivered to a high standard across the MPS, reducing inconsistencies between Borough Command Units (BCUs) so victims – wherever they are in London – get the same good quality support and access to the same services.

- Commission a specialist VAWG organisation to run an independent advisory service in MPS to support victims of domestic abuse and sexual violence by former and serving police officers to help navigate the complaints process and work to rebuild trust in the MPS.

### 3. Protecting women and girls in public spaces, at home and online

There are a number of commitments within this strand that Solace welcomes, including taking online harassment as seriously as other forms of harassment, supporting more consistent implementation of Claire's Law, promoting training for frontline officers and staff on domestic abuse and better protecting women and girls at risk of exploitation. We would welcome more detail about what some of the commitments made in this strand would entail and how they would be implemented, including more information on VAWG problem profiles being set up in each Borough Command Unit (BCU), reinforcing that online harassment and abuse should be taken as seriously as other forms of abuse, and better protecting women and girls, particularly those at risk from exploitation and/or violence resulting from their involvement with gangs. We would urge some caution against, for example, using police reported crimes to build profiles by boroughs as this may not paint an accurate picture. Areas which have a higher rate of incidents reported may not necessarily be because the crime rate is higher, but because communities have higher levels of trust in the police and are more likely to report crime.

On the issue of consistency, Solace has found that the way in which each BCU deals with cases of domestic abuse and sexual violence varies hugely, and that the approach of the BCU often depends on the individual attitudes of the Detective Inspector. By running services in 10 London boroughs, we have seen first-hand the inconsistency between BCUs and the impact this has on bringing perpetrators to justice. This inconsistency needs to be addressed to ensure victims get the same level of care and support wherever they report abuse.

The commitments to increase officer visibility and coverage in key "hotspot locations" and piloting Project Vigilant risk making women and girls from marginalised groups, particularly Black and other ethnic minorities, religious minorities and LGBT+ groups, who already have lower trust in the police feel less safe and more at risk. These lower levels of trust are down to historic and current mistreatment and disproportionate discrimination of minorities and marginalised groups by police and the criminal justice system more broadly and the over-policing of certain communities leading to a culture of suspicion and mistrust.

We would urge that officers on patrol and doing such outreach, particularly if they are plain clothed officers, should operate in pairs with one female officers. It is also imperative that these officers are required to undertake extra vetting to ensure no officer with prior evidence of misogynistic views or a history of violence against women is put in this position. To support the officers in addressing sexual violence, officers should be given additional training on understanding and identifying sexual assault and supporting victims through this. Women and minority groups must be assured that this will not lead to them being less safe, and must be able to trust the intentions of the officers taking part in these initiatives.

We welcome the commitment to provide DA Matters training for 8,500 frontline officers and staff, but are concerned that this would only be to train less than 20% of MPS officers and staff at the current level of staffing. Specialist training on domestic abuse should be rolled out to all frontline officers and staff, which should include counter and civilian staff who can be the first people victims come into contact with. Training on domestic abuse is also imperative for Sergeants and Detective Inspectors who make the ultimate decision as to whether a case is taken to the Crown Prosecution Service (CPS) or not. Considering the high turnover of staff in the MPS, this training should be given to all new recruits as they join. All training on domestic abuse and VAWG should be co-produced and evaluated by VAWG sector organisations. In addition to DA Matters training, all MPS staff should 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's Space in their campaign for Valerie's Law).

A key issue that has not been mentioned in this section is protecting women and increasing women's safety around police officers. Given the very real and well-evidenced concerns of many women, particularly marginalised women, about their treatment by police officers, commitments in this section outlining how women can be better protected from police would have been welcome.

To further improve this strand of the action plan, MPS could consider including commitments to:

- Evaluate how consistently each BCU deals with cases of domestic abuse and sexual violence and make the necessary improvements to ensure victims in all boroughs receive the same high standard of care and support.
- Roll out DA Matters training and specialist training in cultural competency to all frontline officers and staff, Sergeants and Detective Inspectors.
- Ensure all officers who are put in positions to support and work closely with victims of domestic abuse and sexual assault are given additional training on identifying, understanding and supporting victims.

#### **4. Working with our partners and with women to improve prevention and victim care**

The treatment of victims by police and in the criminal justice system needs significant improvement to rebuild trust in the police, reduce victim attrition and improve the number of prosecutions. As such, Solace welcomes the MPS' commitment to doing this. Working with women is crucial to developing an effective plan and this partnership working should also include specialist 'led by and for' VAWG organisations who can support the MPS in developing initiatives and ways of working that take a trauma-informed approach and account for cultural nuances within different communities.

Some of the new initiatives mentioned in this strand of the action plan require more detail to better understand the impact, if any, they would have on improving prevention and victim care. For example, how the Walk and Talk sessions with female officers would help victims of domestic abuse who would not be able to come forwards in such a public way and may be in more danger if they are seen talking to the police by their perpetrator.

The commitment to ensure vulnerable and intimidated victims are identified early is important and has the potential to reduce serious violence. It would be helpful to understand better what kinds of activities the MPS would implement to achieve this. Many people, women in particular, are unlikely to be identified by the police as victims early, and it may be more effective for other statutory agencies to play a significant role in early identification, supported by the police. For example, a GP is much more likely to be coming into regular contact with a vulnerable woman and be in a better position to spot early signs of abuse than a police officer. Furthermore, victims with concerns related to their immigration status are highly unlikely to ever make themselves known to the police out of a legitimate fear of deportation. For victims with insecure immigration status, early police intervention could cause significant distress in victims and risks putting them in more dangerous situations if their information is passed on to the Home Office for potential immigration enforcement.

This strand of the plan seeks to find new and innovative ways of caring for victims, but overlooks impactful things already being done that should be standardised, rolled out across all BCUs, funded appropriately and promoted within the MPS. One example of this which has not been mentioned in this plan is increasing the number of IDVAs and ISVAs working in police stations and improving the understanding within the MPS of the vital role they play in supporting victims through the criminal justice system. Solace has found that police awareness and understanding of such advocates and the role they play is inconsistent and sometimes absent, which needs to be addressed. Sexual Offence Trained Service Police Officers (SOITs) can also have a significant impact on improving victim engagement, tend to better understand how to investigate sexual offences and can help victims feel supported through the process of reporting, potentially reducing victim attrition. Scoping the feasibility of an equivalent for victims of domestic abuse would be welcome.

Another way victims could receive better care would be to ensure they are communicated with consistently, appropriately and considerately throughout the criminal justice process. Officers must understand the best way to approach a victim with news, particularly if it is unwelcome news, and what support they might need. Communicating in the presence of an ISVA can be hugely helpful for victims to feel there is someone supporting them during the conversation, and for the ISVA to be able to ask follow up questions and communicate the detail of the conversation to the victim after they have processed the news they receive and to help them with any next steps or appeals.

Solace recommends MPS consider the following additional commitments to include:

- Review the ways in which police work with IDVAs and ISVAs to look at how to strengthen this partnership working to better support victims.
- Evaluate current communication methods with victims, looking at how this can be improved and standardised.
- Assess the barriers in place for victims with concerns related to their immigration status from reporting abuse to the police, identify other statutory bodies better placed to provide support and discuss with the Home Office its position on not putting in place a firewall for migrant victims between the Home Office and police.

## **5. Bringing offenders to justice and improving criminal justice outcomes for victims**

Every part of the criminal justice system needs to be improved and optimised to support victims and bring offenders to justice.

Solace welcomes the recognition in this plan that an important way to bring offenders to justice and improve outcomes for victims is to improve the way in which digital evidence is gathered. We support the commitments to establish teams of Digital Media Investigators and Digital Forensic staff in each BCU and to improve timeliness so victims are not left without a phone for more than 24 hours.

It is important that the process and rationale behind digital evidence gathering is also looked at more widely. In particular, it needs to be recognised how sensitive a person's phone data is, and therefore safeguards need to be built into this process to respect this. The Policing, Crime, Sentencing and Courts Bill, currently in the House of Lords, includes a section on extracting information and looks to set parameters on how this should be carried out. As the largest police force in the country, MPS should look at the best practice and improvements being suggested as part of this debate to adopt as a matter of priority, leading the way for the rest of the country. For example, there should be a record kept of what has been reviewed, which should be overseen to ensure anything that is unrelated to the case is excluded, and victims should receive a report to show what has been captured and looked at, and by whom. It is important that victims feel confident in handing over their phone for evidence gathering. With MPS investing in new technology to speed up the data extraction process, Solace would welcome MPS looking at ways in which it can improve victims' confidence, for example by allowing a lawyer to be present while the police go through their phones. Leaving victims without a phone can be extremely dangerous and disorientating. MPS should look instead at prioritising data extraction from the suspect's phone and taking a suspect-focused approach to the investigation.

As this strand of the action plan notes, there are a number of procedures in place which aim to bring offenders to justice, like bail and protection orders and offender management systems. In order to improve criminal justice systems, it is important all of the means already in place are implemented and implemented consistently across London. Bail and protection orders, for example, are vital to help keep victims safe, but they are often not used, or breaches of orders are not investigated, putting victims at risk. This strand commits to using all legal means available to manage offenders effectively and reduce the risk they pose, but more information is required to understand why this is not being done in the first place, what the barriers are, how these will be tackled and what actions will be taken in order to use all of the legal means available.

Solace is concerned about the effectiveness of delivering a tagging system for high risk domestic abusers on their release from prison if this is not managed properly. For example, Solace is aware of a number of cases where perpetrators have abused the system and evaded monitoring. One such example was when a perpetrator with an electronic tag pretended to have COVID-19 in order for police to not come to his property to check on him. A tagging system can only improve the safety of victims if it is managed properly, breaches are investigated promptly and there is closer working between the police and probation to do this. If it is then deemed to be effective, it should be rolled out to for all perpetrators of domestic abuse to keep all victims safe.

Police should commit to case building when looking for evidence, and when deciding to take no further action on a case, this decision should focus on the merits of the case rather than a presumption of the decision the CPS or jury will make. The Centre for Women's Justice notes that though the CPS is supposed to give Early Investigative Advice (EIA) on case-building and potential lines of inquiry, particularly in rape cases, the [HM Crown Prosecution Service Inspectorate](#) in 2016 found that only 15 out of 90 files examined had EIA. Police, when gathering evidence, should proactively request EIA from the CPS to build their cases more effectively and take a merits-based approach. Police processes should have an independent quality control mechanism built in to check No Further Action (NFA) decisions. Police officers must thoroughly understand rape myths and why these are myths to ensure such they do not form the basis of no further action decisions.

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

- Review how effectively bail and protection orders are being enforced, and breaches being investigated.
- Look at how effective tagging is to manage high risk domestic abusers and the feasibility of monitoring all domestic abusers to keep victims safe.
- Put in place safeguards when extracting data from victims to ensure privacy is respected, transparency and openness is promoted and victims feel safe and comfortable sharing their phones with the police.

## **6. Improving Met culture and professional standards**

Solace welcomes the inclusion of this strand as part of the VAWG action plan, and the recognition by MPS that VAWG is also perpetrated by police officers and staff, and that the culture within the MPS is not one that is inclusive or conducive to supporting victims of VAWG. Serious leadership and accountability within MPS is needed to take forward the necessary overhaul of the culture and professionalism in MPS.

Improving Met culture and professional standards is a big undertaking, and more detail is needed on all of the commitments under this strand to explain how they will be implemented, the impact they will have and how they will be measured and evaluated. Further detail would show MPS is serious about addressing this, and foster a more open and transparent culture.

An urgent review of all current investigations into allegations of sexual misconduct and domestic abuse against officers and staff is important, and should extend to all cases of sexual misconduct and domestic abuse allegations made against officers, including those who are no longer serving, rather than a dip sample. This will not only improve transparency and help to rebuild trust, but will help to ensure that people who are not fit to serve in the MPS are removed.

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. The commitment in this plan to deliver Operation Signa - an internal programme to ensure people actively intervene and challenge inappropriate behaviours – risks having very limited efficacy if there is a culture embedded which does not allow for women and individuals from marginalised groups to feel empowered to speak up without serious repercussion. More needs to be done to support people to

come forwards, for example ensuring all whistle-blowers are granted anonymity and working with groups like Police MeToo to understand the barriers in place preventing people from coming forwards.

Solace would recommend setting up an independent support and advice service in the MPS, such as the Independent Sexual Misconduct Advisory (ISMA) that was provided by Solace to the Houses of Parliament, for expert advice and support in cases of domestic abuse and sexual violence. The advisory service should be open to all people working in the MPS or who have experienced domestic abuse or sexual violence by former or serving MPS officers, and a specialist VAWG organisation should provide this support and advice, including on how to access other services and guided assistance through internal complaints procedures.

In this strand Solace would welcome a commitment to ensuring all staff have the correct, up-to-date level of vetting as a matter of priority, considering the findings in [The Independent](#) that more than 2,500 long-serving officers and other police staff in England and Wales do not have the correct level of vetting. MPS must not underestimate the lack of trust in the MPS as a result of historic and recent actions of a number of officers, and it must take extraordinary measures to root out within its ranks perpetrators of VAWG and those with misogynistic, racist, homophobic and transphobic views to instil confidence back in the public.

Solace would recommend MPS also including the following commitments in this strand:

- 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.
- Assess the barriers in place that prevent MPS officers and staff from coming forwards and challenging inappropriate behaviour, including the impact of not providing anonymity for whistle-blowers.
- Commission a specialist VAWG organisation to provide an independent advisory service within the MPS to provide advice and support for victims of sexual misconduct by former or serving MPS officers.
- Ensure all staff have the correct, up-to-date level of vetting as a matter of priority.