

Violence against women and girls:

End-to-end case handling
review summary

February 2024

Introduction

Violence against women and girls is a concern for policing and the police complaints system. Complainants and victim-survivors continue to tell us about the barriers they face when they come into contact with the police. High-profile distressing cases such as the murder of Sarah Everard and the actions of police officers investigating the murders of Bibaa Henry and Nicole Smallman have led to increased public concern about the police's response in this area. This has damaged public confidence in policing and raised questions about the cultural attitudes towards women and girls in policing more generally.

As part of our work on violence against women and girls, we worked with eight police forces to review a selection of complaint and conduct files. We examined 121 files to review how they handled complaint and conduct matters where violence against women and girls was a factor and whether their responses were appropriate, proportionate and in line with relevant law and guidance. We recognise that there have been many other reviews and enquiries into the police response to violence against women and girls. However, our scope was slightly different and we have focussed on our remit and powers: the police complaints system and the application of the *Police Reform Act 2002*. We share these findings so that all police forces in England and Wales can hold conversations about their own standards and culture in response to violence against women and girls.

The eight forces we worked with showed that in process terms, there are many areas where they are compliant with the legislation, which was encouraging to see. We know that through increased scrutiny of the police response to violence against women and girls, professional standards departments (the departments that handle police complaint and conduct matters) have introduced new initiatives to improve policing. This includes activity/work to raise awareness of the complaint process, provide better training for staff and adopt new processes to respond to complaint and conduct matters. Our findings may reflect this new focus.

However, our findings also demonstrate that even when most processes are followed correctly or go well, those that do not, have a devastating impact on the real people affected. We may have identified good practice, but we have also identified areas where things have gone wrong.

Our recommendations cover five areas which were identified as part of the review. They look to advise on how to improve the accessibility, for victim-survivors and complainants when using the complaints system in relation to violence against women and girls; the approaches to victim-survivors vulnerability and safeguarding issues; the use of language and the recognition of sensitivity around it; decisions, assessments and outcomes and reasonable and proportionate complaint handling.

This summary report shares our findings from a review into 121 cases (77 complaints and 44 conduct matters). The [full report is also available](#).

Accessibility

We explored how accessible the police complaints system is for victim-survivors and complainants of violence against women and girls (VAWG). We looked at whether suitable information about the complaints system is available to complainants and victim-survivors and asked forces what mechanisms or initiatives they have in place to help police victims or witnesses to report police-perpetrated violence against women and girls. Examples provided by the police forces included:



A dedicated prevent officer who engages with partnership agencies to raise awareness of the complaints system.



A public portal called Safecall for members of the public to report police-perpetrated abuse anonymously through an independent party.



A VAWG conference to raise awareness of VAWG-related issues, ways to report them, and the role of the police complaints system.



Allocating cases to experienced, specialist officers with expertise in VAWG matters.



Updating the online portal where members of the public submit complaints to make it easier and more accessible.



“VAWG courageous conversations” where police staff and officers are invited to discuss their experience of VAWG.



Treating allegations of police-perpetrated domestic abuse as priority investigations.



“Listening circles” run by the VAWG Strategic Lead, alongside a representative from the Association of Women in Policing.

Vulnerability and safeguarding

Owing to the nature of complaint and conduct matters involving a violence against women and girls factor, we expect that complainants / victim-survivors will often be vulnerable or may require some form of support. As part of our review, we looked for evidence that complainant / victim-survivor care and safety is given due consideration, that there is clear decision-making for who will be responsible for their wellbeing, and that signposting or referrals to support agencies happen when needed.

We were not persuaded that complainant/victim-survivor care and safety is always given enough consideration.



We found 14 cases where the complainant / victim-survivor should have been considered vulnerable but wasn't.



Of the cases handled formally (88 cases), we found that over half (61%) of the complainants / victim-survivors were not considered to be vulnerable.



The case files did not always include details about whether the complainant / victim-survivor's vulnerability was assessed and it was not always clear who was responsible for their care.



We found positive examples of police victims being offered workplace support services and protective measures to prevent them from having to work with or near the perpetrator, but not in every case we sampled.



Some forces have good partnerships with local charities or support organisations, and in some cases, the police force take some responsibility for victim care.

In most cases, there was no clear responsibility for victim care. We would expect the complaint handler to have conversations with the complainant / victim-survivor about their needs and to signpost them to support agencies, where relevant. We expect that complainant / victim-survivor care and wellbeing are given due consideration and that police forces are aware of local provisions, so they can signpost or refer people to these services.

Language

We reviewed the language used by complaint handlers when communicating with complainants / victim-survivors to establish if the contact was sensitive and if there was any evidence of victim-blaming language. Communicating in a way that is free from victim-blaming improves the confidence of victim-survivors in the process and avoids further victimisation.

We found that appropriate and sensitive language was used in the majority of cases we reviewed. However, there were examples of inappropriate and / or victim-blaming language present.

“less experienced, younger and more naive member of the department...working on a shift of colleagues with established working relationships that are accustomed to the office banter and culture that exists”

In this example, the age and inexperience of the police victim is not relevant and should not be referenced as a way to shift blame to the victim-survivor. This example also highlighted how inappropriate team cultures, attitude and banter is sometimes seen as acceptable and expected.

Other examples of inappropriate language included:

“They became intimate” when referring to a report of sexual assault which implies consent.

‘She seemed really keen’ when discussing CCTV images with a police perpetrator during interview.

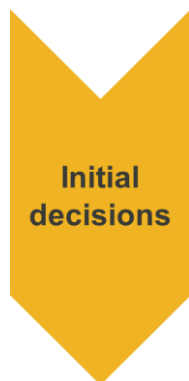
Decisions, assessments and outcomes

We looked at whether the initial decision-making, handling methods, and outcomes of VAWG complaints and conduct matters were appropriate and in line with the law.



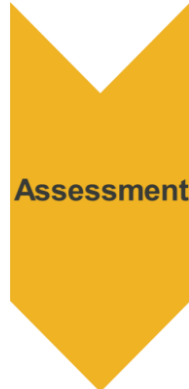
Early contact

- Forces are making or attempting to make early contact with complainants / victim-survivors in most cases.
- Limited record-keeping made it difficult to establish the quality of their contact and engagement.



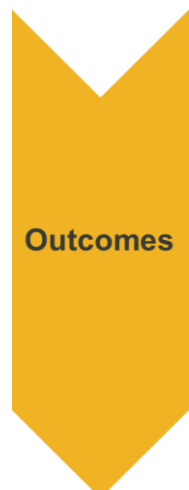
Initial decisions

- Forces correctly referred the appropriate cases to the IOPC. Out of the cases that were not referred, we disagreed with one.
- Forces chose an appropriate handling method in most cases. We disagreed with the handling method in eight cases.
- Forces relied upon complaint handlers flagging conflicts of interest and lacked standard procedures to check for declarations.



Assessment

- Overall, off-duty conduct was assessed with the same level of seriousness as conduct that happened on duty.
- Patterns of behaviour were not always considered in cases where it would be relevant to do so. For example, where a police employee has behaved in a similar way before or where a pattern could be emerging.
- Conduct matters (where there is no complaint) were generally treated more seriously than complaints.



Outcomes

- We were satisfied that most decisions made at the conclusion of handling were appropriate in both complaint and conduct cases.
- In cases handled formally, three-quarters of the outcome reports were accurate and addressed all matters raised.
- Some cases contained insufficient information for us to determine whether the outcome was communicated appropriately to the complainant or victim-survivor.
- In conduct cases, the victim-survivor or interested person was not always routinely updated on the outcome of the investigation.

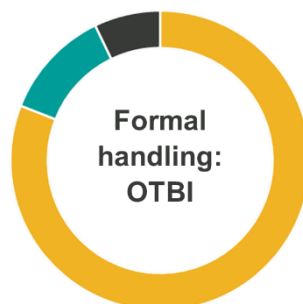
Reasonable and proportionate handling

Different handling methods are available to forces depending on the type of case, the seriousness of the matter, and the level of enquiries needed to address the concerns. Complaints can be handled informally if they can be addressed promptly and without detailed enquiries. For example, providing an explanation or update. Conduct matters and complaints that are not suitable for informal handling can either be investigated or handled 'otherwise than by investigation' (OTBI). This is a flexible handling method designed to provide meaningful answers and remedy dissatisfaction without a full investigation. Investigations and OTBI are both types of formal handling. The legislation determines that certain matters must be handled formally based on the nature of the complaint or conduct matter.



Informal handling

86% (24 out of 28) of the cases dealt with informally were handled reasonably and proportionately. The remaining four cases should have been handled formally based on the seriousness of the complaint and the actions required to resolve it.



Formal handling: OTBI

81% (34 out of 42) of the cases handled OTBI were handled reasonably and proportionately. Where they were not, it was due to cases being rushed through to an outcome, relevant enquiries being missed, and a failure to impartially review evidence. We found four cases that should have been investigated based on the seriousness of the complaint.



Formal handling – investigation

86% (44 out of 51) of investigations were considered reasonable and proportionate, this included pursuing suitable enquiries and obtaining relevant evidence. In two cases, some relevant enquiries were missed, and five cases contained insufficient information for us to make a decision.

■ Yes ■ No ■ Unable to determine

Recommendations

As a result of our review of case files, the IOPC has made nine recommendations aimed at improving the handling of complaints involving violence against women and girls, and complaints handling in general. We aim to build trust and confidence to report complaints and conduct matters involving violence against women and girls, and support the police response to those matters in a way that is robust and victim focused.

Recommendation	Details
1	The National Police Chief’s Council (NPCC) provides guidance to all police forces in England and Wales on the definition and correct application of the violence against women and girls Centurion national factors.
2	The IOPC will begin a separate project focusing on how police forces respond to police perpetrated domestic abuse (PPDA) reports. This will include how reports of PPDA are identified and recorded, through to how complaint and conduct matters are handled. The work will build on what we know from the CWJ super-complaint report and will focus on identifying solutions to improve the policing response to PPDA.
3	Police forces should work with local support groups, charities and organisations to form partnerships to provide appropriate support. Complaint handlers should have information and resources available to them, so they know what those local partnerships are.
4	Where a complaint or conduct matter involving violence against women and girls is raised, complaint handlers should consider the possible vulnerabilities associated with being a victim-survivor or complainant of a violence against women and girls matter. Complaint handlers should consider what support might be required and discuss the options with the complainant / victim-survivor. Responsibility for their care should be documented on the file.
5	Police forces should include conflict of interest declaration records as standard on all cases involving violence against women and girls, to show that they have considered any possible conflicts and to reassure complainants / victim-survivors of the suitability of the appointed complaint handler.
6	Police forces should make improvements to record keeping for complaints handled informally and apply some basic standards. Police systems should record enough information to be able to show what action has been taken and what information was given to the complainant / victim-survivor. Where a complainant was updated verbally about the

Recommendation	Details
	informal handling, a short summary note should document that conversation.
7	Police forces should satisfy themselves that they have processes in place to ensure that complainants / victim-survivors, or interested persons in a conduct investigation, are fully updated on the outcome of the conduct investigation. The outcome can be communicated by giving them a copy of the conduct investigation report, where appropriate, or by other means agreed with the complaint / victim-survivor such as face-to-face. Where the outcome is communicated verbally, a record of the conversation should be made.
8	Complaint handlers should ensure that when communicating the outcome of a complaint or conduct matter involving violence against women and girls, they consider the specific needs or vulnerabilities of the complainant / victim-survivor. They should give consideration to the way the outcome is communicated and what support is required after the handling of the violence against women and girls matter. Complaint handlers should seek to signpost to relevant support where appropriate. This links to recommendation three where vulnerability and support should be considered throughout the handling of the matter involving violence against women and girls.
9	All police forces should consider what initiatives and mechanisms they have in place to promote access to the police complaints system for violence against women and girls specific groups. Forces should consider what local partnerships their police force could benefit from. They should look at the specific needs of police victims to access the system and what provisions are in place internally to support them. Consideration should be given to how these initiatives and mechanisms to report violence against women and girls is promoted.

Next steps

- 1** The IOPC Oversight team will also hold structured discussions with forces about these recommendations as part of our regular force engagement programme. We will monitor the implementation of our recommendations and support forces to put in place initiatives that work to improve complaints handling. Any updates or examples of good practice that we can share with other forces will be shared in our [Oversight monthly newsletter](#).
- 2** The IOPC will work with the National Police Chief's Council (NPCC) to improve the quality of forces' data collection of violence against women and girls matters. This will allow police forces and other oversight bodies to understand the picture in policing as it relates to violence against women and girls and in turn, to monitor and track improvements or areas of concern.
- 3** The IOPC has updated its [Focus guidance](#) on data capture to include violence against women and girls case studies and examples to support the application of violence against women and girls national factors. Alongside the NPCC guidance, this will improve data collection and intelligence about VAWG complaint handling.
- 4** The IOPC will conduct further work to review the police handling of police perpetrated domestic abuse cases. This further work will form part of a separate sub-project and we will create a separate report on it.
- 5** The IOPC produced a guidance document called **Ending victim blaming: violence against women and girls: Why language, attitudes, and behaviours matter**. It is for IOPC staff and all police forces to use. We aim to release our guidance externally in March 2024.
- 6** 'Know Your Rights' campaign – we are developing a campaign to raise awareness of the police complaints system and the rights of victims when making a complaint. 'Know Your Rights' will be targeted at victim-survivors of violence against women and girls and the organisations supporting them. Our campaign will launch in the Spring 2024.

February 2024

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