

Violence Against Women and Girls submission

August 2013



Police and Crime Committee Members

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Role of Police and Crime Committee

The Police and Crime Committee examines the work of the Mayor's Office for Policing and Crime (MOPAC) and reviews the Police and Crime Plan for London. The Committee can also investigate anything that it considers to be of importance to policing and crime reduction in Greater London and make recommendations for improvements.

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Foreword

Violence against women and girls remains a worryingly prevalent and persistent problem in London. Despite progress in improving gender equality, gender-based violence continues to blight the lives of victims and survivors across our city. Victims and survivors deserve better support and assistance.

In my work I hear horrifying examples of the impact of violence against women and girls. But I am also fortunate to see some of the excellent work that tackles negative attitudes to women, prevents violence and supports victim-survivors so they are not defined by this violence. And whilst there is much more work to be done, the police and criminal justice system should be congratulated for their efforts to tackle perpetrators and to improve the service they offer to victim-survivors. This work to improve must continue.

We were fortunate to hear from many organisations and individuals that assist victim-survivors and want to thank them for taking the time to help us in our investigations, and to thank them publically for the invaluable work they do every day, often unsung. These individuals and services working to tackle violence against women and girls are vital, not just to the victim-survivors they work with but to the wellbeing and on-going success of London.

The London Assembly is wholly supportive of the Mayor as he strives to eradicate violence against women and girls. In this response, the Committee sets out its recommendations urging the Mayor to exploit his unique leadership role to improve the service offered to victim-survivors. We want action as well as words and will monitor the progress of the revised strategy closely.



Joanne McCartney AM
Chair of the Police and Crime Committee



1. Introduction

The Police and Crime Committee agrees with the Mayor's assessment that "violence against women and girls is one of the most serious and pressing issues facing women and girls in London".¹ In London, more than 3,000 rapes, nearly 10,000 sexual assaults and nearly 50,000 domestic incidents were reported to the Metropolitan Police Service in the year to May 2013.² Nationally, fewer than one in four people who suffer abuse at the hands of their partner and only around one in ten women who experience serious sexual assault report it to the police.³

The Committee's investigation

In preparation for the publication of a new Strategy, the Committee undertook an investigation into violence against women and girls (VAWG) in the winter of 2012.⁴ We recognised that there is a significant challenge facing the Metropolitan Police Service (MPS) and Mayor's Office for Policing and Crime (MOPAC) in addressing the prevalence of VAWG and low levels of reporting. Our intention was to influence the second Strategy as it developed by providing an independent assessment of progress against the first Strategy and helping to ensure that the refreshed Strategy would help to reduce incidents and improve confidence to report.

VAWG is an umbrella term for crimes against women that are directed at a woman either because she is a woman, or that disproportionately affect women.⁵ VAWG issues include, but are not limited to, domestic violence, stalking and harassment, forced marriage, so-called "honour" crimes, female genital mutilation (FGM), rape and sexual offences, human trafficking for sexual exploitation, prostitution, child abuse, pornography and sexual harassment at work.

We have limited our comments to the Mayor's strategy on violence against women. However, we must remember that there are male victims of domestic abuse and sexual violence and there is no clarity on how the Mayor will support these Londoners. This must be addressed in MOPAC's assessment of victim services and the Mayor should not ignore his duty to all victims of crime.

Overview of response

We believe that the Mayor's aspiration that London should take a global lead to prevent and eliminate violence against women and girls is entirely correct and attainable. His first Violence Against Women and Girls Strategy, published

in March 2010, was held up as good practice. It recognised that many of the crimes affecting women and girls were linked and attempted to move the response from looking at single issues (such as domestic violence) to considering all forms of violence against women and girls. We welcome this broad approach because it allows a number of issues, such as FGM and the sexual exploitation of girls associated with gangs, to come to the fore.

We hope that the Mayor's refreshed strategy will ensure world-class support to victim-survivors in London and are pleased to see that a number of the issues raised during our investigation have been included in the consultation document. Experts told us that violence against women and girls needs to be tackled at its cause by addressing harmful attitudes and challenging negative notions of masculinity.⁶ We are pleased that the Mayor is seeking to take a lead in educating young people and addressing problems at an early age. We also heard that VAWG interventions should deal with perpetrators⁷ and therefore welcome MOPAC's commitment to develop the evidence base around perpetrator programmes.

Despite these promising indications, some of the commitments made in the Mayor's manifesto have not yet been delivered. It is not clear, for example, what the Mayor's FGM task force has actually delivered. Processes for tackling FGM remain unsatisfactory - for example the MPS does not collaborate with social services to ensure that at-risk girls are placed on the Child Protection Register⁸ - and despite a handful of referrals there have as yet been no prosecutions in London.⁹ We accept it would take time to deliver against all of the priorities in the Strategy, but the Mayor has been in office for five years and cannot be allowed to reach the end of this term without tangible impact and delivery against the commitments he has made.

In this response, we have made recommendations for improving the Mayor's approach to ensure that the Mayor's second strategy moves from admirable commitments to clear service improvements for victim-survivors.¹⁰ At a time when many local services are being cut back, he has a key leadership role in ensuring that the overall service offer does not suffer. If he does not use that role for good, he risks letting down London's women.

2. Improving the provision of domestic violence services

MOPAC has a key leadership role in bringing partners together and making the ‘invest to save’ case about the provision of support to female victims of violence.

In his 2012 manifesto for re-election, Boris Johnson promised a safer London for women, a key element of which was his proposal for a pan-London domestic violence service.¹¹ The Mayor recognises the need to ensure that all victim-survivors, regardless of where they live in London, should “have access to a high quality, professional and specialist support service”.¹²

Thinking about what is required across London is positive, not least because it addresses some of those cross-boundary issues that we face... It is good to have a holistic approach and services being able to come together and look at how we can truly address the need across London.

Nicki Norman
(Deputy Chief
Executive, Women’s
Aid)

We heard evidence to support the Mayor’s aim to secure at least a minimum service across London. The current process of commissioning at a borough level and to different time frames means provision is inconsistent.¹³ Many victim-survivors will not necessarily access support in their own borough¹⁴ so it is important that services are both in place across London and accessible to victim-survivors regardless of their ‘home’ borough. This is a challenge that MOPAC has recognised so it has been working with London Councils, Refuge and others to develop tools to enable a better understanding of supply and demand for refuge places, to enable more effective commissioning in the future.¹⁵

MOPAC’s consultation sets out options for the possible role and structure of this service. While this is a promising development, over a year after his election London appears no closer to benefiting from a pan-London domestic violence service. This is disappointing as there are compelling reasons to establish this service now.

Invest to save

We believe there is a clear case for investing in an adequate level of domestic violence support. Aside from a moral duty to protect victim-survivors, early investment in support services could save costs further down the line. It has been reported that one in every ten calls received by the MPS regard domestic violence.¹⁶ Ensuring there is adequate provision could help to reduce the likelihood of repeat offences and in turn the likelihood of the police having to deal with further calls.

Many women suffer multiple beatings before seeking help.¹⁷ If she is then unable to immediately access support – for example being turned away from a refuge¹⁸ - there may be a longer-term impact. It may take many more incidents before she seeks help again, or she may end up in other vulnerable

situations until support is available. We must then acknowledge that these women could have additional support needs by the time they access other provision.

There is also a strong incentive to tackle domestic violence given its impact on the children and young people, the ‘forgotten victims’ of domestic abuse.¹⁹ Research has shown that in London, one in seven children and young people under the age of 18 will have lived with domestic violence at some point in their childhood, equivalent to at least 260,400 of London’s children and young people.²⁰ MOPAC notes that domestic violence can have negative impacts for the children through poor outcomes and can have a wider impact on society by increasing their propensity for crime and anti-social behaviour.²¹ These problems may have considerable downstream costs attached for public agencies and therefore preventing the abuse may be a more effective and cost-effective intervention.

Despite these incentives, MOPAC’s consultation does not commit to the delivery of this service within the life of the next Strategy. It says only that proposals will be informed by the analysis of victim support services that MOPAC has committed to in the Mayor’s Police and Crime Plan 2013-16. We are concerned that another three years could pass before clear proposals for domestic violence services are even developed, let alone delivered. MOPAC has said that the new service should provide an additional resource where gaps exist. We are concerned that if MOPAC does not act faster, there will be far more limited provision and a greater number of gaps to fill.

MOPAC’s value should be in bringing partners together to ensure that services meet the needs of Londoners. In a period of pressure on funding, MOPAC should be developing and articulating the ‘invest to save’ case and convincing partners of the importance of funding domestic violence support services. It could corral financial contributions from partners that, while small individually, could be used to ensure sustainable service provision across the capital.

Meeting service demand

During our investigation we heard worrying evidence that domestic violence services are struggling to meet demand. At the borough-level, funding pressures mean that services are already being restricted to only the most high-risk victims.²² While some prioritisation is needed, there are inherent risks in this approach:

“If a woman is scoring 13 on our risk assessment tool she has identified 13 very serious risk factors happening in her life but she is not automatically able to access support... Local authorities set this risk threshold very high due to a lack of resources, but we know that risk is

dynamic, it can change hour by hour, and we do not think it is acceptable that, because of a lack of resources, everyone else is going to be ignored.”²³

One example where provision struggles to meet demand is refuge places. Historical estimates found that refuge provision nationally was equivalent to meeting about 65 per cent of demand.²⁴ Simply making better use of resources cannot solve this: Refuge told us that despite having provision in nearly every borough, their service is always full, with only about 1.5 per cent not in use at any one time for turnover.²⁵

We also heard that this situation is likely to be exacerbated as funding pressures increase. Most refuges are funded by local authorities through the Supporting People Programme. Local authorities’ spending pressures mean that funding for the majority of refuges is being cut, and future funding looks uncertain.²⁶ Similarly, London has already seen some services heavily scaled back as a result of lost funding. Women’s Aid told us that within a year the dedicated outreach services for children affected by domestic violence in London halved through loss of funding.

The principle of specialist support

Organisations’ support for a pan-London approach came with a caution against it imposing a generic, across-the-board service. We heard that “there are fewer and fewer specialist services out there”²⁷ and that some groups of victims are effectively “invisible” in service provision.²⁸ Specialist services have been demonstrated to have a positive impact: for example Imkaan²⁹ told us that having access to a Black and Minority Ethnic (BME) specialist service help to increase reporting.³⁰

Similarly, women with additional support needs such as mental health issues or drug and alcohol support needs “are much less likely to be supported by a generic organisation with a low cost bed space”.³¹ In these circumstances, smaller local services tend to be required to meet specialist needs. These do tend to cost more than larger scale providers but these providers have the skills and expertise to deliver co-ordinated support.³²

Recommendation 1

MOPAC must urgently complete its review of how effectively demand for domestic violence services is being met. It should use this assessment to work with partners to develop an action plan for how gaps in service will be overcome by the end of the Mayoral term. This should include MOPAC developing a partnership strategy for bringing together funding from the full range of sources.

3. Improving outcomes with Independent Advocates

The Mayor’s commitment to maintain the number of Independent Domestic Violence Advocates may not go far enough and is missing an opportunity to achieve a step-change in victims’ experience of criminal justice.

Independent Domestic Violence Advocates³³ (IDVAs) generally work with victim-survivors who are at risk of serious harm or homicide. They play an important role in supporting domestic violence victim-survivors through the criminal justice process, helping to bring perpetrators to justice, and reducing further incidents of violence.

“IDVAs are a useful part of tackling domestic violence. To try to break the cycle people need support; that first step in a domestic violence scenario is a very big step for an individual”.

Deputy
Commissioner Craig
Mackey

The value of Independent Advocates

Evaluations of IDVA schemes have found that around 60 per cent of victims using their service reported no further violence following IDVA involvement.³⁴ Refuge reported a 40 per cent reduction in the risk of homicide in cases with IDVA involvement. There is a high level of criminal justice involvement in IDVA schemes, with almost two thirds resulting in a police report.³⁵ This is a positive development given the significant challenge that police and partners face in driving up reporting and building victim confidence. A national evaluation has shown that IDVA involvement may increase the likelihood of conviction, with nearly 80 per cent of prosecution cases that involved an IDVA resulting in a conviction.³⁶

Commissioning IDVAs

According to the Mayor’s manifesto, there is inconsistent coverage of IDVAs in London, linked to boroughs’ piecemeal approach to commissioning these services.³⁷ A key manifesto commitment was therefore to maintain the number of IDVAs in London. We heard evidence that suggests simply maintaining IDVA numbers will not be sufficient to meet demand: “our IDVAs cannot cope with the level of work that is out there, and that is only in dealing with the very highest risk cases”.³⁸

MOPAC is clear that the Mayor’s proposal will not replace borough funding for IDVAs.³⁹ But as noted previously, local budget pressures are such that funding is already being cut: recent national research showed IDVA service providers had faced funding cuts of 25-100 per cent in 2011.⁴⁰ MOPAC needs to clarify

There is a critical role for the specialist services to be playing in working in partnership with the police and criminal justice agencies, in order to improve those criminal justice agency outcomes and to hold perpetrators to account.

Julia Dwyer (National Advocacy Manager, Refuge)

how its intervention will maintain current supply. In the next few years, as it begins to take on responsibility for commissioning services to support victims of crime, it should also consider how to increase the provision of IDVAs to meet demand.

MOPAC's role

IDVAs are precisely the sort of service that MOPAC may want to commission. MOPAC acknowledges that specialist services “empower women by enabling them to talk about and make sense of the violence, find safety, seek justice, rebuild their lives and recover from the long-term consequences of violence.”⁴¹ IDVA services are able to provide this wrap-around support while victim-survivors chose an appropriate course of action.

The Mayor also has said one of his key priorities is to secure “swift and sure justice for victims”.⁴² In the consultation for the refreshed Strategy, MOPAC has placed importance on “ensuring a renewed focus on prosecuting and convicting perpetrators”.⁴³ Given the improved criminal justice outcomes that IDVAs can achieve, this would seem a sensible place to invest resources to meet these aims.

Recommendation 2

In the final Strategy, the Mayor's commitment should be extended to deliver an increase in the supply of IDVAs. MOPAC should work to secure funding to increase their supply across London by the end of the Mayoral term.

4. Improving the frontline response

The MPS has admirable high level commitments to improving how the police respond to victims of sexual violence, but too often the initial response still has a damaging effect on victims' confidence in the police.

MOPAC's consultation document notes that "much more is yet to be done to ensure that those who have experienced sexual violence and other forms of VAWG are not dissuaded from seeking justice."⁴⁴ It goes on to identify challenges within the criminal justice system that need to be tackled. While these are important issues, this fails to acknowledge that many women will not even reach the stage of seeking a criminal justice outcome due to a poor experience when they initially approach the police.

Barriers to reporting

Some campaigners argue that women have lost confidence in how the MPS deals with rape. There are worrying indications about the MPS's performance which may affect women's willingness to report: according to HMIC, the sanction detection rate for actual and attempted rape stood at 24 per cent for the MPS in the 12 months to March 2013, lower than the national average of 28 per cent.⁴⁵ The MPS recognises this as an area requiring improvement and is currently developing a Rape Performance Improvement Plan, which includes challenging targets to improve the proportion of sexual offences that are solved.⁴⁶

Women may also be concerned that they may be blamed if they are sexually assaulted. While this may not be due to the behaviour of the police, it is a challenge for them as it may limit the confidence of victims coming forward. This Committee challenged the head of Sapphire following criticism that his plans to target women about how to reduce their vulnerability to rape "re-allocate blame from the perpetrator to the victim".⁴⁷ He was absolutely clear that this was not the intention but suggested, more could be done, for example expecting venues and licensed premises to do more to help keep women safe.

The MPS must also be aware that efforts to increase confidence and reporting can be undermined by their actions elsewhere. The Committee has heard that Operation Nexus, which brought UKBA staff in to the MPS to target foreign criminals, may impact on victim confidence. RAMFEL, an organisation working

"Persistent myths and stereotypes about what constitutes a 'real' victim and a 'real' perpetrator commonly deter women and girls from reporting sexual and other forms of violence"
End Violence Against Women Coalition

with refugees and migrants, is particularly concerned about the implications for vulnerable victims, such as those affected by domestic or sexual abuse. It notes they “may now be even more reluctant to report crime for fear of retribution from a perpetrator who will be additionally aggrieved for having been brought into contact with the UKBA.”⁴⁸

The first response

The MPS’s specialist sexual assault team, known as Sapphire, is often commended for how it handles rape and sexual assault victims. The unit’s focus on investigating sexual offences and rape, and not other crimes (such as solicitation or immigration) is helpful. Officers in Sapphire are subject to a rigorous training which covers technical aspects of working on sexual assault and rape cases – such as preserving evidence – but importantly also focuses on how to handle victims and understanding why victims act in a particular way. Victim support organisations and rape survivors have helped to develop and deliver the training.⁴⁹

“The frontline officers, the training that they get at the minute, I am concerned about the level and knowledge... we are looking to limit the exposure the victim has with frontline staff”

Mick Duthie (Head of Sapphire, Metropolitan Police Service)

But this expertise is very much concentrated in Sapphire and poor initial responses by other teams persist. In our victim care investigation, support organisations told us that prevailing police culture affects officers’ response to certain victims. This is borne out by a recent MPS employee survey, which found that almost three in ten employees think that some victims are more deserving of a good service than others.⁵⁰

Women Against Rape also says that some victims are disbelieved, particularly if they have been attacked before.⁵¹ Research by the Crown Prosecution Service seemed to validate these concerns. It found that “victims are being punished because of ‘damaging myths’ about false rape and domestic violence allegations”.⁵² The research shows that false allegations of rape are “very rare” and the Chief Crown Prosecutor used the figures to urge against an “over cautious” approach to allegation.

The Head of Sapphire told this Committee that he was concerned about the skills of frontline officers in responding to victims of rape and sexual assault.⁵³ As a result, he reported that the MPS would trial an approach with Havens⁵⁴ in which victims will be taken immediately to a specialist environment better equipped to respond. This may also help to limit the delays that victims experience: victims of sexual offences have been reported to wait an average of 13 hours to be interviewed and medically examined after reporting rape.⁵⁵ We therefore welcome this approach and look forward to an evaluation and possible roll-out should it be shown to improve outcomes and victim satisfaction.

We were also told that the MPS is working with the National Policing Improvement Agency on a computer-based training package for frontline staff that has been developed with another force. The Committee has previously heard some concerns about the effectiveness of computer-based training programmes.⁵⁶ We would also suggest that the benefits of Sapphire’s training – such as hearing victim accounts – cannot necessarily be replicated in a computer-based programme.

Following our investigation into victim care, the MPS has started to design a ‘Total Victim Care’ training package for all Borough and Neighbourhood officers. This will be delivered face to face by professional police training staff and comprise one day’s mandatory training each year for every neighbourhood and Borough police officer.⁵⁷ We suggest this is an ideal opportunity to educate officers about the specific approaches required when dealing with victims of sexual abuse, perhaps via a condensed version of the Sapphire training. This will help to ensure that all victims of sexual violence, regardless of which teams they access in the police, will be assured of a minimum standard of care.

Recommendation 3

The MPS’s new Total Victim Care training package, being delivered to all neighbourhood officers, should include specific elements on how to deal with victims of sexual violence. This part of the training should be developed in consultation with Sapphire and MOPAC should require it be put in place before the training programme begins.

5. Improving the response to gang-associated women and girls

There is effective support available for women and girls associated with gangs but the biggest challenge is identifying the young women that need this support.

“The police don’t recognise that sexual exploitation by gangs is an issue. They don’t even know what they mean by the term.”

Rahana Mohammed,
Head of Policy, Race
on the Agenda

The Mayor’s first Strategy articulated effectively the challenges facing women and girls associated with gangs. Their vulnerability to offending, violence and sexual exploitation is also reiterated in MOPAC’s consultation. The organisations we spoke to in this investigation welcomed the previous strategy for raising the profile of gang-associated women and girls.⁵⁸ We have been told that the MPS had previously not even considered girls associated with gangs as an issue, has been poor at handling these girls, and has failed to work with partners to address their needs.⁵⁹

Providing support to gang-associated women and girls

In its consultation, MOPAC notes that many of the intervention projects available to gang members aim to support young men to exit gangs and that more specialised services will be needed for young women.⁶⁰ We were told that nationally and in London there are examples of good intervention projects that work to educate young women associated with gangs. However, there were concerns that many generic intervention projects – such as those provided in schools – could only scratch the surface. More intensive interventions are needed to address the risks these young women face and begin changing their behaviour. Currently young women are often referred to these specialist services too late, for example once they are already known to youth offending teams. It was suggested that these generic interventions could be used as a gateway to refer the young women most at risk to more intensive programmes.⁶¹

Identifying young women at risk

Unfortunately, the guests we spoke to told us that identifying the young women that most needed support was the biggest challenge in trying to intervene. Experts were concerned that gang associations are extremely fluid and vulnerability can increase rapidly.⁶² Therefore any approach to evaluating risks needs to be similarly fluid and agile. We were told that a system is needed that maps the young women associated with gang members. This

mapping is the only way that the level of risk or vulnerability of each girl or woman can be properly assessed and the right referral pathway identified.⁶³

Following high profile cases of sexual exploitation by groups, the MPS has developed a new policy on sexual exploitation that explains warning signs to officers and options for responding.⁶⁴ This was seen as a positive development as police teams have been known to work in isolation.⁶⁵ A more coordinated approach should help improve communication, for example between officers working with gangs and teams specialising in domestic or sexual violence.

While the new MPS policy is a positive development, the onus must fall on other services, at least in identifying the young women requiring support. There are real barriers in expecting young women to engage with the police, let alone report offences to them.⁶⁶ Universal services such as school nurses, GPs and teachers are much more likely to see the warning signs of sexual exploitation. But historically, they have been poor at addressing their concerns with the young women or acting on them with partners.⁶⁷ In particular, it was noted that some schools are often reluctant to ask for help on such issues as they are worried about the impact it will have on the reputation of their school.⁶⁸

Research has identified the warning signs of girls that may be being sexually exploited⁶⁹ and these must be promoted to service providers. It was also suggested that these partners should consider gang association as a safeguarding issue, which is often not the case.⁷⁰ Statutory organisations are already familiar with processes surrounding safeguarding, which provides agreed protocols for reporting, recording and acting on concerns. This could help to overcome the challenges of identifying young women at risk and may help to improve the response to the young women by involving a range of partner organisations.

Recommendation 4

MOPAC should use its influence to bring partners together to develop a systematic approach to identifying the girls and women that are at risk due to gang association. These young women should be added to risk registers and dealt with in the same way as other children and young people that need to be kept safe.

6. Improving coordination in policing sex workers

There is a tension for the police between policing those crimes committed against sex workers, while dealing with the illegal activity that can surround sex work.

While the act of prostitution itself is not illegal, the police have a responsibility to deal with the activities associated with it that are, such as kerb crawling, soliciting and keeping a brothel. The police also have a duty to deal with crimes against sex workers including - but not limited to - theft, violence or sexual assault, regardless of the activities they are undertaking at the time of that crime. Yet evidence suggests sex workers are vulnerable to violence, which is often associated with the stigma and isolation of the activities they are involved in.⁷¹

For this reason, reports of violence are likely to significantly under-estimate the risks that sex workers face and prevalence of the problem. We heard various pieces of evidence that help to demonstrate the scale of the issue that highlight the importance of tackling violence against sex workers:

- The MPS told us that it deals with hundreds of cases of violence against sex workers each year.⁷²
- Open Doors, a project working with sex workers in East London, found that one third of the 100 women it was working with between February and April 2013 were experiencing domestic violence at that time.
- The Open Doors Independent Sexual Violence Advocate has helped to increase reporting of violence. In 2011/12, 40 reports were filed with the police from one borough.

Recognising diversity

In our investigation, we heard that there are many variations in sex work across London. Westminster City Council's Adult Services and Health Policy Scrutiny Committee recently conducted an investigation into sex work in its borough.⁷³ An overriding finding from its work was the diversity of the sex market across London and those working in it.⁷⁴ The MPS lead for trafficking pointed out that therefore the services on offer to sex workers need to be as diverse and flexible and the sex market itself.⁷⁵ Similarly, Newham's scrutiny commission highlights the different services required by on and off-street sex

workers.⁷⁶ This diversity has not been adequately recognised. The Strategy is focused on supporting women to exit sex work:

*“the provision of holistic support to address the physical, sexual, substance use, mental health and housing needs of women to **support women to exit prostitution.**” (emphasis ours)*

As pointed out by the MPS, it of course important that women who want to exit sex work have access to support that enables them to realise this aim.⁷⁷ However, we heard that this should not be the sole purpose of the Strategy.⁷⁸ Some of the organisations we spoke to pointed out that some women do not want to exit sex work and they suggested that a better aim would be to enable them to work safely.

Evidence also suggests that the process of exiting sex work can be complex and there may be many lapses or relapses in the various stages of exiting.⁷⁹ In the Mayor’s approach, a relapse could be considered a failure and we would be concerned if support was withdrawn at this point. Therefore, while we agree that there must be support to help women to exit sex work, we do not believe that all forms of support – such as substance abuse or housing support – should be dependent on a willingness to exit.

Different approaches by the MPS

Echoing the point raised earlier in this report, we heard praise for how the Sapphire unit responds when crimes are committed against sex workers and for their approach to engaging sex workers.⁸⁰ However, there were similar concerns that other teams in the MPS do not respond to sex workers as effectively. A primary concern is that the emphasis on enforcement in other teams is sacrificing sex workers’ confidence in the police. This may in turn mean that they are less likely to report crimes committed against them.⁸¹

The MPS argued that it tries to ensure a balanced approach to enforcement activity: for example, the trafficking unit does not conduct raids on brothels unless there is good evidence of it containing trafficked women or children.⁸² However, an activist from the International Union of Sex Workers told us that even if the MPS believes it is taking a measured approach, the perceptions among sex workers are very different. The police must remember that they are in a position of power that can be intimidating to sex workers, regardless of the sensitivity they believe they are showing.⁸³

There can be a tension between building sex workers’ confidence in the police and local pressures to deal with the crime and anti-social behaviour associated with brothels.⁸⁴ Where operations are led by non-specialist teams they can have a damaging effect on the goodwill and confidence established

in the sex working community by other teams. Positive relationships and approaches to partnership working can be broken down when a borough commander changes,⁸⁵ which may again impact on sex workers' confidence in the police.

We acknowledge that borough commanders have to be responsive to local concerns. However, we believe a pan-MPS strategy to sex work is needed. The evidence we received suggested that greater coordination is needed to ensure that local operations do not diminish the confidence built up by specialist teams, such as Sapphire. The Head of Sapphire agreed that a joined-up approach across the MPS would be helpful.

Recommendation 5

A) In his revised strategy, exiting should not be prioritised above improving sex workers' safety and their confidence to report crimes. The Mayor should widen the approach to sex workers to address the needs of all women in who need support: support should not be dependent on a willingness to exit.

B) The Mayor should require the MPS to address tensions in policing sex workers at a leadership level, with a view to developing a common understanding of the MPS approach to policing sex workers.

7. Conclusion

Our response builds up a strong message for the Mayor: his high level aspirations risk being let down by the lack of activity on the ground.

Following the trend set by the Mayor's first Strategy, there continue to be elements of his approach that provide good leadership on violence against women and girls. The high level objectives set out in the consultation are clearly positive and seek to achieve the best for London's women and girls. The consultation's analysis of issues is comprehensive; it provides a compelling case on the scale of the challenge; and it identifies all the major issues that we have come across in our investigation.

However, we believe the Mayor and MOPAC have some work to do to ensure that his refreshed Strategy delivers for London's women and girls. As seems to have been the case with many MOPAC strategies, the consultation document fails to deliver clarity on what will be delivered and when. The consultation document does not include an action plan, timetable, targets or accountabilities against which we can measure success. We hope that when the refreshed Strategy is published later this year these gaps will be addressed.

It is important that MOPAC makes a clear resource commitment to violence against women and girls. The services supporting women are operating in an uncertain financial climate and have experienced substantial cuts in funding. If MOPAC fails to bring greater coherence to funding across London, historical concerns about patchy provision - which MOPAC itself recognises - will not be overcome and the Mayor's ambitions will not be delivered. We therefore stress that MOPAC's main priority in seeking to tackle violence against women and girls must be to work with partners to coordinate secure and sustainable funding.

It is positive that MOPAC has committed to consulting victims in developing its Strategy. This approach should be embedded as MOPAC moves to deliver its priorities over the life of the Strategy. We believe MOPAC would benefit from more a more comprehensive approach to capturing victim-survivors' views on their experiences and on new policies as they are developed. The model adopted by Sapphire, in which victims of sexual violence advise the unit, could be expanded to other victim-survivor groups by MOPAC so that all partners can benefit.

We will return to this topic a year after publication of the refreshed strategy to review progress. We will continue to seek the views of organisations that work with female victim-survivors to inform our work.

Appendix 1 Recommendations

Recommendation 1

MOPAC must urgently complete its review of how effectively demand for domestic violence services is being met. It should use this assessment to work with partners to develop an action plan for how gaps in service will be overcome by the end of the Mayoral term. This should include MOPAC developing a partnership strategy for bringing together funding from the full range of sources.

Recommendation 2

In the final Strategy, the Mayor's commitment should be extended to deliver an increase in the supply of IDVAs. MOPAC should work to secure funding to increase their supply across London by the end of the Mayoral term.

Recommendation 3

The MPS's new Total Victim Care training package, being delivered to all neighbourhood officers, should include specific elements on how to deal with victims of sexual violence. This part of the training should be developed in consultation with Sapphire and MOPAC should require it be put in place before the training programme begins.

Recommendation 4

MOPAC should use its influence to bring partners together to develop a systematic approach to identifying the girls and women that are at risk due to gang association. These young women should be added to risk registers and dealt with in the same way as other children and young people that need to be kept safe.

Recommendation 5

A) In his revised strategy, exiting should not be prioritised above improving sex workers' safety and their confidence to report crimes. The Mayor should widen the approach to sex workers to address the needs of all women in who need support: support should not be dependent on a willingness to exit.

B) The Mayor should require the MPS to address tensions in policing sex workers at a leadership level, with a view to developing a common understanding of the MPS approach to policing sex workers.

Appendix 2 How the Committee conducted its investigation

The Committee held a variety of meetings to consider violence against women and girls between November 2012 and April 2013.

15 November 2013

The Committee held its first meeting on the topic of VAWG on 13 November 2013. The meeting was held in two parts: firstly, a discussion with the new Head of the Sapphire, Detective Superintendent Mick Duthie on the strategic changes he was making to the unit, and secondly, a discussion with the following representatives from women's organisations on progress being made to implement the recommendations in the Mayor's VAWG strategy:

- Yvonne Traynor, Chief Executive, Rape Crisis South London
- Julia Dwyer, National Advocacy Manager, Refuge
- Tracy Blackwell, Head of Development, Refuge
- Sarah Green, Campaigns Manager, End Violence Against Women Coalition
- Sumanta Roy, Policy and Research Manager, Imkaan
- Nicki Norman, Deputy Chief Executive, Women's Aid

29 November 2013 and 20 December 2013

The Committee discussed VAWG at its question and answer sessions on 29 November 2013 and 20 December 2013. Both meetings were attended by the Deputy Mayor for Policing and Crime and the Deputy Commissioner.

30 April 2013

The Committee held two roundtable meetings on 30 April to consider issues relating to policing sex workers and girls in gangs. The following guests were invited:

Policing sex workers

- Catherine Stephens, Activist, International Union of Sex Workers
- DCS Mick Duthie, Head of Sapphire, MPS
- DS Nick Sumner, Strategic and Operational Lead for trafficking at the MPS
- Detective Chief Superintendent Timothy Keelan, Merseyside Police
- Georgina Perry, Service Manager, NHS Open Doors Sexual Health Service

- Cllr Ian Rowley, Chair of the City of Westminster's scrutiny task group into the safety of sex workers

Girls in gangs

- DCS Terry Sharpe, MPS
- Carlene Firmin, Principal Policy Adviser, Office of the Children's Commissioner
- Jennifer Blake, CEO, Safe n Sound Peckham
- Tanya Edwards, Strategic Youth Offending Service Manager, LB Lewisham

The Committee also held a roundtable meeting with representatives from organisations that support women who have experienced violent crime as part of its investigation into care for victims of crime. Similarly, to inform its response to the draft Police and Crime Plan the Committee met informally with representatives from groups which traditionally report low confidence with the MPS (BAME, migrant/refugee communities) where the under-reporting of VAWG crimes and how this relates to confidence with the police was discussed. Findings from those investigations have informed this report where appropriate.

Endnotes

- ¹ Consultation for the second Mayoral strategy on violence against women and girls, 2013-2017, MOPAC, June 2013
- ² London Datastore [accessed 10 July 2013]
<http://data.london.gov.uk/datastorefiles/datafiles/crime-community-safety/mopc-mps-recorded-crime-figures.xls> NB. The data provided is not gender specific.
- ³ Call to End Violence against Women and Girls, HM Government, March 2012. Available at: www.homeoffice.gov.uk/publications/crime/call-end-violence-women-girls/action-plan-new-chapter?view=Binary
- ⁴ More information about how we carried out the investigation can be found in Appendix 2
- ⁵ UN secretary general definition
- ⁶ See discussion at Police and Crime Committee 15 November 2012. This was also raised at the Committee's roundtable on girls associated with gangs. Transcripts of all public meetings are available at: www.london.gov.uk/moderngov/ieListMeetings.aspx?CommitteeId=240.
- ⁷ See discussion at Police and Crime Committee 15 November 2012.
- ⁸ House of Commons International Development Committee: Violence Against Women and Girls Second Report of Session 2013–14. Available at: www.publications.parliament.uk/pa/cm201314/cmselect/cmintdev/107/107.pdf
- ⁹ Mayor's Question 1854 / 2013 from Caroline Pidgeon
- ¹⁰ The recommendations in this report are primarily to the Mayor's Office of Policing and Crime but some recommendations will require cooperation by the MPS.
- ¹¹ Boris Johnson's Crime manifesto 2012, available at: www.backboris2012.com/system/storage/60/8d/1/1752/Boris-Johnson-2012-Crime-Manifesto.pdf
- ¹² Consultation for the second Mayoral strategy on violence against women and girls, 2013-2017, MOPAC, June 2013
- ¹³ Tracy Blackwell (Head of Development, Refuge), speaking at Police and Crime Committee 15 November 2012
- ¹⁴ See discussion at Police and Crime Committee 15 November 2012
- ¹⁵ Briefing for Violence against Women and Girls Coordinators: MOPAC, August 2012
- ¹⁶ Commissioner Sir Bernard Hogan-Howe, speaking at the Police and Crime Committee 29 November 2012
- ¹⁷ Women experience an average of 35 before calling the police, for example. Julia Dwyer (National Advocacy Manager, Refuge) speaking at Police and Crime Committee 15 November 2012
- ¹⁸ The Committee was told that around 50 women a day are turned away from refuge in London (Nicki Norman (Deputy Chief Executive, Women's Aid) speaking at Police and Crime Committee 15 November 2012)

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- ¹⁹ Nicki Norman (Deputy Chief Executive, Women's Aid) speaking at Police and Crime Committee 15 November 2012.
- ²⁰ Meeting the needs of children living with domestic violence in London, Refuge/NSPCC, November 2011. Available at:
www.nspcc.org.uk/Inform/research/findings/domestic_violence_london_pdf_wdf85830.pdf
- ²¹ Consultation for the second Mayoral strategy on violence against women and girls, 2013-2017, MOPAC, June 2013
- ²² See discussion at Police and Crime Committee 15 November 2012
- ²³ Julia Dwyer (National Advocacy Manager, Refuge), speaking at Police and Crime Committee 15 November 2012.
- ²⁴ Based on the estimate of one family place per 10,000 population, as calculated by Women's Aid Federation of England, March 2011 in its Annual Survey of Domestic Violence Services
- ²⁵ Tracy Blackwell (Head of Development, Refuge) speaking at Police and Crime Committee 15 November 2012.
- ²⁶ Women's Aid, Save Survivors' Services Campaign
- ²⁷ Tracy Blackwell (Head of Development, Refuge) speaking at Police and Crime Committee 15 November 2012.
- ²⁸ Sumanta Roy (Policy and Research Manager, Imkaan) speaking at Police and Crime Committee 15 November 2012.
- ²⁹ Imkaan is a UK-based, black feminist organisation focusing on violence against women and girls.
- ³⁰ Sumanta Roy (Policy and Research Manager, Imkaan) speaking at Police and Crime Committee 15 November 2012.
- ³¹ Nicki Norman (Deputy Chief Executive, Women's Aid) speaking at Police and Crime Committee 15 November 2012
- ³² Tracy Blackwell (Head of Development, Refuge) speaking at Police and Crime Committee 15 November 2012
- ³³ IDVAs are sometimes known as Independent Domestic Violence Advisors
- ³⁴ Islands in the stream: An evaluation of four London independent domestic violence advocacy schemes, The Henry Smith Charity, 2010. Available at:
www.caada.org.uk/policy/Safety%20In%20Numbers%20pp%20October%202010.pdf
- ³⁵ Islands in the stream: An evaluation of four London independent domestic violence advocacy schemes, The Henry Smith Charity, 2010.
- ³⁶ IDVA Insights into domestic violence prosecutions, CAADA Insights Service, 2012. Available at:
www.cps.gov.uk/publications/docs/idva_dv_prosecutions_insights_executive_summary.pdf
- By comparison London conviction rates for domestic violence are currently 66 per cent.
- ³⁷ Boris Johnson's Crime manifesto 2012, available at:
www.backboris2012.com/system/storage/60/8d/1/1752/Boris-Johnson-2012-Crime-Manifesto.pdf

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- ³⁸ Julia Dwyer (National Advocacy Manager, Refuge) speaking at Police and Crime Committee 15 November 2012
- ³⁹ Briefing for Violence against Women and Girls Coordinators: MOPAC, August 2012
- ⁴⁰ Measuring the impact of cuts in public expenditure on the provision of services to prevent violence against women and girls: Lancaster University, Trust for London et al, 2011
- ⁴¹ Consultation for the second Mayoral strategy on violence against women and girls, 2013-2017, MOPAC, June 2013
- ⁴² Police And Crime Plan 2013-2016, MOPAC, March 2013
- ⁴³ Consultation for the second Mayoral strategy on violence against women and girls, 2013-2017, MOPAC, June 2013
- ⁴⁴ Consultation for the second Mayoral strategy on violence against women and girls, 2013-2017, MOPAC, June 2013
- ⁴⁵ Taken from HMIC crime comparator. Available at: www.hmic.gov.uk/crime-and-policing-comparator/#chart2
- ⁴⁶ Information taken from letter from Stephen Greenhalgh to Joanne McCartney AM, dated 27 September 2012.
- ⁴⁷ Mick Duthie Accused Of Ignoring Justice After Discussing 'Al Capone' Tactics: The Huffington Post UK, October 2012. Available at: www.huffingtonpost.co.uk/2012/10/11/victim-blaming-ignoring-justice-met-police-crime-head-accused_n_1957799.html
- ⁴⁸ Letter from RAMFEL to the Mayor of London (3 October 2012)
- ⁴⁹ DCS Mick Duthie, speaking at Police and Crime Committee 15 November 2012
- ⁵⁰ Coverage of the results of Your Views Count survey of MPS employees, a survey conducted in January to February 2012 of more than 13,000 employees. The Guardian, 3 November 2012. Available at: www.guardian.co.uk/uk/2012/nov/03/police-met-officers-poll?INTCMP=SRCH
- ⁵¹ Pubs and clubs to face closure in rape crackdown, The Guardian, 10 October 2012, available at: <http://www.guardian.co.uk/uk/2012/oct/10/pubs-clubs-closed-rape-crackdown>
- ⁵² CPS press release, 13 March 2013. Available at: www.cps.gov.uk/news/latest_news/under_the_spotlight/index.html
- ⁵³ DCS Mick Duthie, speaking at Police and Crime Committee 15 November 2012
- ⁵⁴ Havens are specialist centres in London for people who have been raped or sexually assaulted
- ⁵⁵ Pubs and clubs to face closure in rape crackdown: The Guardian, 10 October 2012. Available at: www.guardian.co.uk/uk/2012/oct/10/pubs-clubs-closed-rape-crackdown
- ⁵⁶ Kirsten Hearn (Chair, Inclusion London), speaking at the Police and Crime Committee, 31 January 2013
- ⁵⁷ Letter from DAC Helen Ball to Chair of Police and Crime Committee, 27 March 2013
- ⁵⁸ Taken from discussion at Police and Crime Committee's roundtable on girls and gangs, 30 April 2013
- ⁵⁹ Rahana Mohammed (Head of Policy, Race on the Agenda) speaking at the Police and Crime Committee's roundtable with organisations working with black, Asian and minority ethnic communities, immigrants and refugees, 27 February 2012

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- ⁶⁰ Consultation for the second Mayoral strategy on violence against women and girls, 2013-2017, MOPAC, June 2013
- ⁶¹ Information in this paragraph taken from discussion at Police and Crime Committee's roundtable on girls and gangs, 30 April 2013
- ⁶² Carlene Firmin (Principal Policy Adviser, Office of the Children's Commissioner) speaking at Police and Crime Committee's roundtable on girls and gangs, 30 April 2013
- ⁶³ Carlene Firmin (Principal Policy Adviser, Office of the Children's Commissioner) speaking at Police and Crime Committee's roundtable on girls and gangs, 30 April 2013
- ⁶⁴ Taken from discussion at Police and Crime Committee's roundtable on girls and gangs, 30 April 2013
- ⁶⁵ Carlene Firmin (Principal Policy Adviser, Office of the Children's Commissioner) speaking at Police and Crime Committee's roundtable on girls and gangs, 30 April 2013
- ⁶⁶ Taken from discussion at Police and Crime Committee's roundtable on girls and gangs, 30 April 2013
- ⁶⁷ Rahana Mohammed (Head of Policy, Race on the Agenda) speaking at the Police and Crime Committee's roundtable with organisations working with black, Asian and minority ethnic communities, immigrants and refugees, 27 February 2012
- ⁶⁸ Tanya Edwards (Strategic Youth Offending Service Manager, LB Lewisham) speaking at Police and Crime Committee's roundtable on girls and gangs, 30 April 2013
- ⁶⁹ Office of the Children's Commissioner, Inquiry into Child Sexual Exploitation in Gangs and Groups interim report, November 2012. Available at: <http://www.childrenscommissioner.gov.uk/info/csegg1>
- ⁷⁰ Rahana Mohammed (Head of Policy, Race on the Agenda) speaking at the Police and Crime Committee's roundtable with organisations working with black, Asian and minority ethnic communities, immigrants and refugees, 27 February 2012
- ⁷¹ Report of the Crime and Disorder Scrutiny Commission into Street Prostitution in Newham, December 2012. Available at: <http://mgov.newham.gov.uk/documents/s79058/Review%20into%20sex%20workers%20RAFT%20v%205.pdf>
- ⁷² DCS Mick Duthie speaking at Police and Crime Committee's roundtable on policing sex workers, 30 April 2013
- ⁷³ Westminster sex worker task group recommendations report. Available at: www.westminster.gov.uk/services/councilgovernmentanddemocracy/councils/decisionmaking/osc/adult-services-health-p-s/westminster-sex-worker-task-group/
- ⁷⁴ Cllr Ian Rowley (Chair of the City of Westminster's scrutiny task group into the safety of sex workers) speaking at Police and Crime Committee's roundtable on policing sex workers, 30 April 2013
- ⁷⁵ DS Nick Sumner (Strategic and Operational Lead for trafficking at the MPS) speaking at Police and Crime Committee's roundtable on policing sex workers, 30 April 2013
- ⁷⁶ Report of the Crime and Disorder Scrutiny Commission into Street Prostitution in Newham, December 2012.
- ⁷⁷ DS Nick Sumner (Strategic and Operational Lead for trafficking at the MPS) speaking at Police and Crime Committee's roundtable on policing sex workers, 30 April 2013
- ⁷⁸ Discussion at Police and Crime Committee's roundtable on policing sex workers, 30 April 2013

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- ⁷⁹ <http://weekscentreforsocialandpolicyresearch.wordpress.com/2012/11/30/exiting-prostitution-research-policy-and-practice/>
- ⁸⁰ Georgina Perry (Service Manager, NHS Open Doors Sexual Health Service) speaking at Police and Crime Committee's roundtable on policing sex workers, 30 April 2013
- ⁸¹ Discussion at Police and Crime Committee's roundtable on policing sex workers, 30 April 2013
- ⁸² DS Nick Sumner (Strategic and Operational Lead for trafficking at the MPS) speaking at Police and Crime Committee's roundtable on policing sex workers, 30 April 2013
- ⁸³ Catherine Stephens (Activist, International Union of Sex Workers) speaking at Police and Crime Committee's roundtable on policing sex workers, 30 April 2013
- ⁸⁴ Discussion at Police and Crime Committee's roundtable on policing sex workers, 30 April 2013
- ⁸⁵ Discussion at Police and Crime Committee's roundtable on policing sex workers, 30 April 2013

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