



Federation Northern Ireland

Department of Justice

A Response to: A Draft Code of Practice on the Exercise of Functions by Policing and Community Safety Partnerships (PCSPs) and District Policing and Community Safety Partnerships (DPCSPs)

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Open to anyone affected by domestic violence

Core Work of Women's Aid: Background Information & Statistics

1.0 Introduction

Women's Aid is the lead voluntary organisation in Northern Ireland addressing domestic violence and providing services for women and children. We recognise domestic violence as one form of violence against women. Women's Aid seeks to challenge attitudes and beliefs that perpetuate domestic violence and, through our work, promote healthy and non-abusive relationships.

2.0 Core Work of Women's Aid

The core work of Women's Aid in Northern Ireland, including Women's Aid Federation Northern Ireland and the 10 local Women's Aid groups is:

- To provide refuge accommodation to women and their children suffering mental, physical or sexual abuse within the home.
- To run the 24 Hour Domestic Violence Helpline.
- To provide a range of support services to enable women who are leaving a violent situation to rebuild their lives and the lives of their children.
- To provide a range of support services to children and young people who have experienced domestic violence.
- To run preventative education programmes in schools and other settings.
- To educate and inform the public, media, police, courts, social services and other agencies of the impact and effects of domestic violence.
- To advise and support all relevant agencies in the development of domestic violence policies, protocols and service delivery.
- To work in partnership with all relevant agencies to ensure a joined up response to domestic violence.

3.0 Women's Aid Statistics (2010 - 2011)

- 12 refuges with 300 bed spaces, playrooms and facilities.
- 1058 women and 754 children sought refuge.
- 15 resource centres for women seeking information and support; group work and training.
- 3,450 women and 3,739 children accessed the Floating Support service enabling women to access support whilst remaining in their own homes and communities.
- Move-on houses for women and children leaving refuges.
- In 2010/11 the 24 Hour Domestic Violence Helpline, open to anyone affected by domestic violence, managed 38,296 calls. This represented an increase of 18% on 2009/10.

4.0 Additional Women's Aid Statistical Data

- Since 1999, Women's Aid across Northern Ireland gave refuge to 14,714 women and 14,356 children and young people.
- During the last 16 years Women's Aid Federation Northern Ireland managed 282,860 calls to the 24 Hour Domestic Violence Helpline.

5.0 Statistics: Domestic Violence & Violence Against Women

- Domestic violence is a violation of Article 5 of the UN Universal Declaration of Human Rights – that “no one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment”;
- The joint NIO, DHSSPS Strategy “Tackling Violence at Home” estimates that the cost of domestic violence in Northern Ireland, including the potential loss of economic output, could amount to £180 million each year.
- UNICEF research released in 2006, showing per capita incidence, indicates that there are up to 32,000 children and young people living with domestic violence in Northern Ireland.
- Where the gender of the victim was known, 76% of adult victims of domestic crimes recorded by the PSNI in 2010/11 were female.*
- Over 30% of all domestic violence starts during pregnancy. **

6.0 Domestic Violence: Crime Statistics

- Domestic Violence is a crime. PSNI statistics for 2011/12 indicate that there were more recorded crimes with a domestic motivation (10,387) than the combined total of all the following crimes (10,327) – all recorded sexual offences (1,836), shoplifting (6,201) and theft of a motor vehicle (2,290).
- PSNI Statistics for 11/12 indicate that they responded to a domestic incident every 21 minutes of every day of the year.
- The total of 10,387 crimes with a domestic motivation in 11/12 represents an average of approximately 1 domestic crime every 51 minutes in Northern Ireland.
- The number of all recorded offences of murder in Northern Ireland in 11/12 total 16. Those classed as having a domestic motivation total 3. Therefore, 19% of all murders in Northern Ireland in 11/12 had a domestic motivation.
- There were 553 rapes (including attempted Rapes) in Northern Ireland in the period 2011/12.

(Source: PSNI Statistics 2011/12)

- Official sources (NISOSMC) estimate that up to 80% of sex crimes are not reported.
- Violence Against Women is not limited to domestic violence, it includes amongst other crimes murder, rape, sexual assault, sexual exploitation, trafficking, sexual stalking and sexual harassment.

(*Findings from the PSNI Crime Statistics Report 2010/11 N.B. "Adult" defined as aged 18 and over)

(** Women's Aid Federation NI)

7.0. Comments

7.1 Women's Aid Federation Northern Ireland welcomes the publication of the draft code of practice on the exercise of functions by Policing and Community Safety Partnerships (PCSPs) and District Policing and Community Safety Partnerships (DPCSPs), and the opportunity to comment upon it on behalf of our ten local groups.

8.0 Summary

8.1 *The PCSP Code of Practice must ensure that local policing plans are linked to existing regional strategies and action plans, such as the Tackling Violence At Home and Tackling Sexual Violence and Abuse strategies and action plans. It must also explicitly outline the mechanism by which this should be delivered by PCSPs and DPCSPs.*

8.2 *The Code should establish clear linkages with other existing structures, such as Local Domestic Violence Partnerships, to ensure that the aims and actions of police are consistent at local, district and regional level.*

8.3 *The PCSP Code of Practice should ensure that PCSPs prioritise hidden crimes like domestic violence, as well as more visible crimes that the communities perceive to be a priority.*

8.4 *The membership and structure of PCSPs should be reviewed to ensure that they are truly representative of society. This includes having an appropriate gender balance within each PCSP and DPCSP.*

9.0 Tackling Domestic and Sexual Violence within the PCSP Framework

9.1 Women's Aid welcomes the mention of tackling domestic and sexual violence within the Code of Practice in Provision B1.1 (page 10). It is however extremely disappointing that this is the only mention of domestic or sexual violence, or associated strategies and action plans, within the entire Code. Nor has it been made explicit that policing and community safety plans, regionally and locally, must deliver on the Tackling Violence At Home and Tackling Sexual Violence and Abuse strategies and action plans.

9.2 Domestic violence is a crime that is by nature hidden and covert, and therefore members of the community are often not aware of its prevalence. Nor are they cognisant of the level of priority that should be afforded to domestic violence-related issues by police.

- 9.3 It is for this reason that we have concerns about objective C2 (page 12), “Ensuring that policing delivery reflects the involvement, views and priorities of local communities”. We welcome the opportunity for communities to be more involved and have a greater say in policing. However, we would point out that there are many thousands of women and children who are victims of domestic violence within all communities, and who can find it difficult to have their views heard. PCSPs should allow for the needs and opinions of these victims, and organisations who advocate for them, to be heard, and facilitate this within the Code of Practice.
- 9.4 As domestic violence is not a crime that tends to be visible in the community, it is less likely that communities will consider it a policing priority. Nevertheless, it is essential that domestic violence remains a policing priority at local and regional level, and that it is not downgraded as a priority due to lack of community awareness.
- 9.5 We share the same concern for the Code’s provisions to deal not only actual crime but with the fear and perception of crime, as laid out in Annex 1 (page 20). While we appreciate that it is important to deal with the fear and perception of crime, and ensure that vulnerable groups such as the elderly feel safe in their communities, priority does need to be given to dealing with actual crime. As domestic violence is a crime that is mostly perpetrated behind closed doors, it is often not given as high a priority as other more visible crimes. PCSPs should not only to ensure that domestic violence remains a top priority, but also join in the effort to raise awareness about domestic violence in the community. To that end, we are of the opinion that the Code of Practice should include reference to raising awareness of hidden crime such as domestic violence, and provide for it to be dealt with appropriately by PCSPs. It should also make specific reference to the Tackling Violence At Home and Tackling Sexual Violence and Abuse strategies and accompanying action plans, and lay down explicitly how PCSPs should take forward the Action plans already agreed upon at regional level.
- 9.6 Women’s Aid welcomes the Code’s proposed linkage between district and local policing plans. However, there is insufficient explanation as to how for example the local priorities of communities via PCSPs would be linked to readily-identified regional priorities. In our professional experience, it has often been the case that policing priorities set out in Regional Policing Plans aren’t reflected in District and Local Plans, particularly where domestic violence is concerned. In a worst case scenario, local policing plans that are devised by PCSPs which fail to take account of regional strategies could in fact be an impediment to fulfilling regional policing targets laid down in domestic violence action plans. The Tackling Violence At Home and Tackling Sexual Violence and Abuse strategies and action plans must be rolled out at a local level, and the role of PCSPs in doing this should be detailed in the Code.

- 9.7 We welcome the PCSP structure as a further means to improve police response to domestic violence at local level. However if, as stated in 2.4 (page 2), PCSPs are to be responsible for “setting the local agenda for community safety in their Council areas”, it is essential that PCSPs have due regard for existing regional plans and strategies already in place, such as the Tackling Violence At Home and Tackling Sexual Violence and Abuse strategies and accompanying action plans. While C2.1 (page 13) states that the Policing Committee are the focal point for public involvement in formulating Local Policing Plans which will inform the preparation of annual Policing Plans for all of Northern Ireland, it should be emphasised that this co-operation is a two-way street, which also requires regional plans to inform local policing plans. In this regard, PCSPs should be an essential vehicle for informing and educating the public, and raising awareness of crimes like domestic violence and how to combat them in a community setting.
- 9.8 We are further concerned by the possibility of non-experts making decisions on policing based on misinterpretation of statistics. In our professional experience, there can be a misperception at local level that local policing planning revolves around lowering all crime statistics. However where domestic violence is concerned this is not the case. In fact we attribute increasing numbers of reported incidents as a positive sign that more victims have the confidence to report domestic violence incidents to the police. It is essential that the Code of Practice instructs PCSPs to follow established best practice and action plans on specific types of crime, to ensure that policing at all levels is moving in the right direction. It should also be mandatory in the Code for PCSPs to consult with existing partnerships, such as Local Domestic Violence Partnerships.

10.0 Increasing Community Confidence in Policing

- 10.1 We support the aims set out in B2.1 (page 10), that PCSPs should work to give confidence to individuals to report crime to the PSNI, and the objective to improve community confidence in policing. Confidence that police will respond proactively to the reportage of a crime is vital to increasing community engagement with police.
- 10.2 This can especially be said of crimes where the perpetrator is an intimate partner or family member, where failure to respond appropriately could endanger the life of the victim, or where a victim feels they won't be believed or that there is no benefit to reporting to the police.
- 10.3 In our experience working with victims of domestic and sexual violence, we have found that victims often fear that their complaint will not be taken seriously or dealt with sufficiently. They fear that reporting incidents to the police will put them in an even more vulnerable position in a home setting with the perpetrator, or that police will fail to

investigate robustly enough, decreasing the likelihood of a criminal case being successful.

- 10.4 We would stress that increasing confidence in victims to report incidents of domestic violence is a very different scenario to, for example, engaging with young people on the streets, and requires an entirely different approach. In order to increase confidence in the police's ability to deal with domestic violence, police must be robust in their monitoring of local incidents and known perpetrators. They must demonstrate that they are proactively present and willing to enforce the law when a domestic incident arises, and target known perpetrators with regular house calls etc.
- 10.5 We would suggest that Objective C4 (page 12) should be amended to read "working class communities, young people, other vulnerable groups, **and victims of crime.**"

11.0 Membership & structure

- 11.1 Women's Aid recognises the need for flexibility in guidance to PCSPs to enable them to function without undue bureaucratic strain. However, we reiterate our position from the previous consultation on the implementation of PCSPs, that it is essential that the Code of Practice should not only be detailed and comprehensive but should allow for rigorous oversight of operational procedures.
- 11.2 We would also query how exactly voluntary sector groups fit into the PCSP structure. Section 3.5 (page 6) acknowledges that "PCSPs will need to take account of, and work closely with, existing community and partnership structures in their area". However, the nature and extent of community and voluntary sector involvement in PCSPs remains unclear due to the ambiguous language within the Code. Phrasing such as "The PCSP may wish to invite additional organisations" (at 3.1, page 5), allows a level of discretion that could lead to inconsistency in engagement across PCSPs and consequently varying quality of policing plans and delivery.
- 11.3 It is particularly disappointing that the draft Code of Practice does not outline in more detail how PCSPs might interact with existing structures, such as local domestic violence partnerships. It is essential that this is explicitly outlined in the Code of Practice.
- 11.4 We note that the PCSP engagement with groups "may include consultation". We would suggest that, on certain specialist issues, consultation with relevant specialist groups should be a mandatory part of the PCSP process, and that this should be more strongly reflected in the Code of Practice.

- 11.5 Women's Aid is also extremely concerned at the degree of discretion left to PCSPs in light of their composition. As we mentioned in our previous submission on implementation of PCSPs, it is our experience that Councils can be inconsistent in their understanding and engagement with domestic violence issues. Therefore it is worrying that such a level of discretion is left to PCSPs, and that the Code of Practice merely encourages Plans to be in line with each individual Council's own procedures and policies.(at D.3, page 15)
- 11.6 The role of Policing Committees, as laid out in 3.3 (page 5), is also ambiguous. It does not expressly state that the role of Policing Committees includes ensuring that all regional plans and strategies are being integrated at local level. Nor does it assign the role of monitoring local policing progress against regional action plans. In our view, this is an essential function of the Policing Committee, and one that should be prescribed within the Code of Practice.
- 11.7 We also express our concern about the gender balance within PCSPs. As councillors are predominantly male, it is extremely disappointing that there is no provision contained within the Code of Practice to ensure a gender balance within PCSPs. A gender balance which reflects the gender composition within communities would encourage a wide range of issues and priorities to be adequately focused on and addressed, and would ensure that the views and priorities of all members of society are addressed.

12.0 Governance & Accountability

- 12.1 Women's Aid supports the establishment of a Policing Committee to ensure that local policing is robust and accountable to the public.
- 12.2 We note that Partnership Plans must include costed key priorities and targets. We believe that the Code of Practice should mandate not only costings for key priorities, but also monitoring mechanisms and set time frames for measuring success. This would ensure efficiency and accountability.
- 12.3 In D1.1 (page 15), the Code mentions several strategies and strategic priorities that should be taken into account when devising a partnership plan. We are extremely disappointed that there is no specific mention either of the Tackling Violence At Home or the Tackling Sexual Violence and Abuse strategies and action plans, or mention of existing structures such as Local Domestic Violence Partnerships. Bearing in mind the prevalence of domestic violence (the PSNI respond to a DV call-out every 21 minutes of every day), coupled with the hidden nature of domestic violence crimes, explicitly mentioning these strategies would go a long way towards ensuring that PCSPs appropriately prioritise domestic violence and sexual violence in their Partnership Plans. This is especially the case given our aforementioned concerns

over inconsistencies between Councils in addressing domestic violence appropriately.

For further information about this response contact:

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