

The Rt Hon Priti Patel MP - Home Secretary
2 Marsham Street
London SW1P 4DF

Sir Thomas P Winsor – Her Majesty’s Chief Inspector of Constabulary
Her Majesty’s Inspectorate of Constabulary
6th Floor Globe House
89 Eccleston Square
London SW1V 1PN

8 November 2019

Dear Home Secretary and Sir Thomas,

HM Inspectorate of Constabulary and Fire & Rescue Services: The Poor Relation – The Police and CPS Response to Crime Against Older People

Thank you for the thematic report covering crimes against older people, which was published on 17 July 2019. I welcome the report.

Please accept my apologies for the delayed response, which followed a discussion with Assistant Portfolio Director Ian Elliott asking for an extension in order for me to gain a fuller understanding of not only the recommendations requiring action by the Chief Constable, but also the current position of the National Police Chiefs Council (NPCC), Crown Prosecution Service (CPS) and College of Policing (CoP). This is, in my view, important given that a number of the recommendations require national solutions prior to local direction being sought.

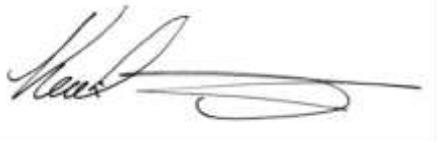
My overarching belief following my full reading of the report is that we should recognise that certain population groups are potentially more susceptible to being victims of crime, but that this should lead to wider preventive measures and not necessarily to specific policing services for such people. We should not impose an assumption of vulnerability on a whole population due to their age alone.

In the attached Appendix 1, I have covered a number of the recommendations and provided comments where relevant on action being undertaken by Humberside Police, but also my understanding of the work of other national organisations at this point in time.



This response will be published on my website.

Yours sincerely,



Keith Hunter
Police and Crime Commissioner for Humberside

cc:

Kit Malthouse MP, Minister of State for Policing and the Fire Service
Mark Burns-Williamson OBE, Chair of the Association of Police and Crime Commissioners
Lee Freeman, Chief Constable, Humberside Police
Phil Gormley QPM, HM Inspector of Constabulary, Northern Region
Councillor Evison, Chair of the Humberside Police and Crime Panel

APPENDIX 1

The National Police Chiefs Council (NPCC) and the CPS should, within six months, agree a definition of what constitutes an older victim and take a coordinated approach to understand and respond to the problem.

I believe the NPCC is seeking creation of a specific category of elder abuse although the College of Policing has reservations and is holding discussions with them. However, the College of Policing approach to vulnerability mirrors that of NPCC.

Nationally, CPS recently published a revised policy on crimes against older people following engagement with stakeholders and formal consultation, including a flagging definition for crimes against older people. If the NPCC accepts the recommendation, I understand that the CPS will work with them to build on this and agree an approach. The CPS definition of elder abuse is already incorporated into the new College of Policing Vulnerability Toolkit being developed with both West Mercia and Greater Manchester police forces.

Locally, Humberside Police and the CPS are working from the same definition of an older person:

“Where the victim is 65 or over, any criminal offence which is perceived by the victim or any other person, to be committed by reason of the victims vulnerability through age or presumed vulnerability through age.”

This is consistent across the Force Control Room, Patrol, Community Officers and Investigators.

HMICFRS recommends that within six months, chief constables should work with their PCCs and other relevant organisations to review whether victim support services can be provided in a better way

I understand that the NPCC believe referral pathways are trickier to navigate since partners and police all work off different systems and align to different local authorities and thresholds. The Association of Directors of Adult Social Services (ADASS) are considering the possibility of a national referral form for use by a number of agencies (police, fire, ambulance) to create consistency.



However, there is at present a lack of an agreed definition nationally for 'adults at risk'/'vulnerable adults'. These two terms can be interpreted very differently and trigger different responses. I hope that the College of Policing will provide clarity on this.

Locally, Humberside Police recognise that understanding the data picture around demand will be key to improving victim services. As part of their local response to improve this, there is a new practice in place allowing direct referral electronically to the Multi Agency Safeguarding Hub (MASH) for further safeguarding assessment and discussion with relevant partner agencies. There is also new reporting in place, allowing vulnerable victims (for a number of different reasons) to be readily identified and checks undertaken to ensure they get the best possible service. I believe that Humberside Police have good working relationships with partners in the MASH environment and mechanisms for requests for information to be completed and shared.

My office currently commission Victim Support to deliver a Victim Liaison and Referral Service across the Humberside Police area. This service provides support to all victims of crime, other than Domestic Abuse and Serious Violence which are supported through another provider. We also provide additional Restorative Justice Services through Remedi, who support and work alongside Victim Support. Within our approach there are differentiated contact methodologies for standard and enhanced victims, ensuring enhanced victims receive their first contact within 24 hours, with an Advocate who will support them throughout their cope and recovery journey. Victim Support currently contact well over 90% of all enhanced referrals (vulnerability assessed) within 24 hours.

Humberside Police carries out audits of data for all victim demographics to assure the ability of the Force to provide effective support to all victims. They are currently:

- Looking at joint and more frequent approaches covering priority areas based on vulnerability and concern.
- Undertaking assessments of need and vulnerability flags to ensure alignment with victim needs assessments, as well as disseminating lessons learned.
- Increasing awareness through more regular briefings to front-line officers, to improve victim self-referral pathways and provision of self-help materials.
- Engaging Force leads in Victim Support service contract management, and a joint approach to performance management by both my office and Force leads.

The NPCC should, within six months, establish a standard way for police forces to conduct a victim needs assessment

I understand that the NPCC has no plans to introduce a stand-alone vulnerability strand for the over 60's. I support this as the focus should not be on the population as a whole. We need to understand that although there is an added risk of vulnerability for an overall population, this should not necessarily create a need for specific services or the attaching of a 'label' to everyone over 60. The College of Policing vulnerability training emphasises the need for officers and staff to understand a person's vulnerabilities and avoid compartmentalising individuals, with age being just one personal factor that could impact on vulnerability. We need to focus on the wider spectrum of vulnerability.

My understanding is that the College Of Policing is starting to address gaps in assessing victim needs and vulnerabilities through revision of their victims and witnesses products. The College of Policing has taken ownership of development of a police vulnerability toolkit for frontline officers. I believe they recognise more investment is needed in training and education and are working with the CPS and others to produce



a fit-for-purpose package, recognising that vulnerability can be complex and not specific to persons over 65 years.

Locally, Humberside Police will actively use the toolkit when it becomes available. They have also adopted a file quality assessment tool to improve file quality and highlight vulnerability.

The NPCC and College of Policing (COP) should, within six months, develop a strategy for how the police service should respond to the problems faced by older people, and agree who should be responsible for it

I understand the NPCC is engaging with leads with responsibility for work-streams highlighted in the HMICFRS report and linking in with external partners to seek views to create national joined-up solutions. Humberside Police audits have led to improved recording and quality of safeguarding plans for victims.

The NPCC and COP should, as a matter of urgency, develop guidelines and training for officers involved in adult safeguarding procedures

I understand the NPCC is proposing to use evidence gathered by HMICFRS to review vulnerability training and guidance products. Humberside Police will work with the NPCC to develop a coherent approach to adult safeguarding and materials to support victim and witness care. This will address the main areas of concern identified by HMICFRS, that vulnerable victims and witnesses are not always supported throughout the investigative process. The College of Policing is also seeking a case of abuse against an older person to include in their vulnerability training, and developing toolkits for initial response to adults at risk and adult safeguarding and investigation of crimes against adults at risk.

Humberside Police delivered mandatory training to all officers last year and this year to reinforce key messages in relation to the identification of vulnerability.





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