

NI Policing Board / PSNI

Policing Plan 2025-2030

Consultation

**Response from the Commissioner Designate
for Victims of Crime for Northern Ireland**

December 2024

1. About the Office of the Commissioner Designate for Victims of Crime

- 1.1** The Commissioner for Victims of Crime's Office (CVOCO) is an independent body which represents the interests of victims of crime in Northern Ireland. The Commissioner Designate was appointed by the Minister of Justice in March 2022 to be an independent voice for victims of crime. The overarching purpose of the Commissioner Designate is to represent the needs and interests of all victims of crime and help drive systemic improvements across the criminal justice system.
- 1.2** This will include helping to identify any areas where victims are not consistently being provided with their entitlements set out within the Victim Charter and ensuring that their issues and experiences are raised in the public arena, with Government, with criminal justice organisations and organisations that support and represent victims, in order to bring forward effective change.

2. General Comments

- 2.1** The Commissioner Designate welcomes the opportunity to provide input into the Northern Ireland Policing Board and Police Service NI's Policing Plan 2025-30.
- 2.2** The Commissioner Designate is supportive of having a dedicated outcome centred on victims and guided by the Victims Charter for Northern Ireland. Victims are a critical part of the process of delivering justice in our system and focusing on performance and metrics relating to victims can only enhance this system. Section 3 of this response sets out some further detail regarding what would be required to deliver a genuinely victim focused police force.
- 2.3** One of the key messages that this office has been hearing from victims, both directly, and through our recent Victim Survey¹, is consistency. While some victims are having a positive experience with the PSNI, this is not the case for all victims. Additionally, many victims have informed this office that they had a positive experience with a certain officer but that at a later stage in the process

¹ The survey was carried out online between September 2023 and March 2024 and can be accessed here: [2023-24 Victim Survey Results.pdf](#)

the experience has been very different. Different parts of the system are not providing the same quality and consistency of service. This can relate to victims' needs assessment, quality of investigations, frequency and nature of communication / updates, and whether referrals are being made to the relevant support agency.

2.4 This demonstrates that many parts of the system can and do work well, but only in certain circumstances or when certain individuals are involved. This needs to be more widespread and become the standard for all cases. Addressing this reality does not require new, resource intensive pilots and initiatives. It requires a focus on back to basics and getting these initial contacts right – through humanity, professional curiosity and good communication.

2.5 As the Commissioner Designate noted in her CVOC Strategy 2022-25:

“The system is failing to deliver what is promised to victims and what they, as the individual most greatly impacted by the crime, should rightly expect. Far too often, the needs of victims are an afterthought, and rather than being seen as an obligation enshrined in law, often fall to the bottom of the list of priorities which may or may not happen.”²

3. Building a victim focused culture

The Commissioner Designate strongly supports the Policing Plan Outcome 1 that PSNI is victim focused. Below are a number of key requirements that we believe will help demonstrate this:

3.1 Leadership & Accountability

- There is a need to promote a culture that prioritises victim care at each point of the system – from initial report, follow-up investigation and engagement, Achieving Best Evidence (ABE) interviews and so on. This must be led from the top and embedded throughout the service right through to front line response
- Close collaboration between policy and delivery (frontline & specialist units) is required to achieve this.

² CVOC [Strategy 2022-2025](#)

- Greater responsibility and accountability to respond to victim concerns is also essential – for many victims a formal complaint to the Office of the Police Ombudsman for Northern Ireland (OPONI) is not the preferred outcome and they would much rather have an immediate resolution to their concern
- In addition to the Victim Charter compliance outlined below, improved data capture and analysis of the victim experience is needed to aid understanding and accountability. A practical example of this might be data collection and analysis on victim **reasons** for withdrawal from the criminal justice process, response times to previously flagged high risk victims.
- It is important to see evidenced commitment to progress stated priorities across the whole of the organisation / core business in decision making and prioritisation.

3.2 Victim focused response

- In order to ensure that our response to a victim is the most appropriate it is essential that we undertake a basic needs assessment with victims at first contact that can subsequently be built upon and that travels through the system with the victim – this could cover basics like recording first language, if the victim has disabilities and any additional support needs etc.
- Requirement for referrals to be made to appropriate support organisations in **all** cases unless there has been an active objection from the victim. This requires close partnership and collaborative work.
- All staff should have an understanding of trauma and the potential they have to ‘harm or heal’ in an officer’s interaction with a victim.
- All officers require a foundational awareness and understanding regarding victim care with specialist units requiring a deeper level of expertise and understanding.
- The system must actively seek victim feedback on all crime types to help learn and improve.
- Victims should be provided with a safe and comfortable environment where they can be interviewed to give evidence.

3.3 Communication

- Updates must be provided in line with Victim Charter obligations and in formats that work for victims (this relates back to the needs assessment piece at start of process).

- Victim expectations about the role of PSNI and the investigation process must be managed – i.e. staff not making promises or assumptions about what other agencies may do after PSNI pass information on.
- Better use of technology and advocates to assist with keeping victims informed about their case (new planned victim portal, if done properly, may help address this).
- Greater, more proactive involvement in the role the Victim and Witness are Unit (VWCU) play with regards to support for victims is required by PSNI.

3.4 Training on key areas

Key topics are proposed below, though others may also be required (eg trauma-informed service delivery), and need to embed across all roles / districts:

- Explore understanding of bias, prejudice and discrimination (sectarian, hate crime, classism etc);
- Rape myths / victim blaming / domestic violence perpetrated on males and females. The unintended impact of throw-away comments on a victim and a case;
- Victim Charter for Northern Ireland and specifically the PSNI obligations contained within it.

4. Victim Charter Compliance Data

4.1 As well as treating victims with dignity and respect at all times, an essential means of demonstrating to victims that they are valued within the justice system would be to make a commitment to more robust Victim Charter compliance across each of the criminal justice agencies. The Victim Charter, which guarantees victims of crime the right to be treated with dignity and respect, to be kept informed about available support, provided with information they need and given an opportunity for concerns to be addressed, has been on a statutory footing for almost ten years now. Yet, despite being enshrined in law since 2015, criminal justice agencies in Northern Ireland have not developed processes to monitor individual agencies' compliance with and performance against this charter.

4.2 The Victim Charter is linked to research and thinking on procedural justice and the need for victims to have a positive experience within each part of the system regardless of the outcome of the case. In our recent victim survey we asked victims what was most important for them based on their experience of reporting a crime to the police. The top three responses were:

- Having the matter dealt with efficiently
- Having the crime fully investigated
- Being treated fairly and with respect by the police

If we can get these bits right, we know we are building a victim focused police force.

- 4.3** Monitoring overarching data on compliance with the Victim Charter will provide valuable insight on where the issues are for victims and what areas each criminal justice agency needs to address and improve upon. This ties in well with indicator 1.5 under outcome 1: '*Providing a High Quality Service to Victims*'. For example there is a need to track repeat victimisation and the effectiveness of preventative measures and support hubs in addressing that issue and meeting that need.
- 4.4** Compliance data is how the Commissioner Designate will determine how well the Victim Charter is being implemented and it is important that this data must include or be complemented by victims' views.
- 4.5** Under outcome 1, a number of indicators have been set out that will help inform whether the outcome is being achieved i.e. PSNI is victim focused. Each of the first four indicators refer to 'effectiveness' for example '*The Effectiveness in Tackling VAWG*' and '*The Effectiveness in Tackling DA*'. While focusing on each of these areas is to be welcomed, it is important to define what effectiveness means and that key metrics are developed that will help determine whether each indicator is being met.
- 4.6** The Commissioner Designate has placed data collection across the criminal justice system as one of her three strategic priorities and she is committed to exploring how to monitor and evaluate the experience of victims across the system. The Commissioner Designate would be happy to collaborate and inform the development of suitable metrics and cost effective opportunities to learn from those with lived experience. This aligns with work we are already doing in partnership with the Department of Justice (DoJ) regarding victim surveys and victim charter compliance data.
- 4.7** Another area that has been raised as a concern with and by the Commissioner Designate's office is that of complaints. Where victims are not receiving the treatment they are entitled to they have the right to complain. Data on

complaints provides valuable insight and information on how to make improvements to a service. Improved data collection and analysis of complaints will help to inform improvement in this area.

- 4.8** According to the 2023/24 victim satisfaction survey carried out by the PSNI, 55.8% of respondents agreed with the statement: *I am satisfied with how well I have been kept informed of the progress of my case* and 66% agreed with the statement: *I am satisfied with my contact with the Police Service of Northern Ireland*. Conversely, this shows that a third or more respondents were dissatisfied with how well they were kept informed or their overall contact with the PSNI.
- 4.9** From the Commissioner Designate's engagement with OPONI, there seems to be a significant gap in data and analysis in this area. It is essential that PSNI and OPONI work collaboratively to ensure these gaps are plugged and that information is being fed back to the PSNI regarding victims' experiences.

5. Victim Care / Partnership

- 5.1** The Plan references the challenges of mental health and the pressures /implications for policing in the context section. It would be helpful to see greater emphasis on collaboration and partnership working with the Department of Health, Health & Social Care Trusts and other mental health service providers in the Policing Plan for the next five years.
- 5.2** It is widely acknowledged that more clearly needs to be done to address the mental health care crisis in Northern Ireland, for the benefit of those living with mental ill-health and for society as a whole. It is clear that failings to date in grappling with this thorny issue have resulted in preventable victimisation, suffering and deaths. Opportunities are being missed to intervene in a timely manner to assist those struggling with mental ill-health, including at the various points at which a person might engage with justice system agents including the PSNI, Prisons Service and Probation Board. Further collaborative work is required to ensure better support is in place for both crime prevention and in the aftermath of crime. In this regard I note the Right Care, Right Person stream of work and would suggest greater recognition and reference to this in the new Policing Plan given the significant impact of mental ill-health on policing outlined in the context of the plan.

6. Workforce

- 6.1 The Plan has articulated a dedicated outcome regarding the make-up and working environment of the PSNI: '*PSNI have a representative, valued and enabled workforce*'. Striving to have a representative workforce is commendable and it is important that victims of all backgrounds see themselves represented and reflected in the police force.
- 6.2 Collecting Section 75 data of those victims reporting crime will also help understand how representative the workforce is of victims with whom the PSNI are engaging.
- 6.3 Finally, and in keeping with the principle of valuing staff, it is important that the PSNI also responds appropriately when a staff member becomes a victim of crime – whether committed by a colleague or externally. Victims, regardless of professional background or rank in the hierarchy, need to be supported and feel supported in the aftermath of a crime. This feeds into organisational culture and all staff being valued.

If you would like to discuss any of these points in further detail, please contact the office via:

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