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March 2023

COMMISSIONING STRATEGY



Dyfed Powys Commissioning Strategy

July 2022

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COMMISSIONING STRATEGY



Introduction

The Police and Crime Commissioner (PCC) for Dyfed Powys acts as the voice of the public on policing and crime matters. The Commissioner is responsible for setting the strategic direction for policing within the Force area. Dyfed Powys police force covers the counties of Carmarthenshire, Ceredigion, Pembrokeshire and Powys. It has a population of over 488,000, which is significantly boosted with tourists each year and covers a land mass of over half of Wales.

This strategy sets out the purpose and direction of commissioning activities within the Office of the Police and Crime Commissioner for Dyfed Powys. It provides detail of the budget and services provided under the Police and Crime Plan and outlines the process for governance and monitoring of service delivery.

PCC statutory duties

PCCs have a number of statutory duties as laid out in the Police Reform and Social Responsibility Act 2011 (the Act). As well as their core policing role, PCCs have a remit to cut crime and disorder and have commissioning powers and funding to enable them to do this. The Act provides powers for Commissioners to award grants to any organisation or body to deliver their community safety priorities.

Upon initial commencement of the role in 2012, Commissioners received consolidated grants made up of funding previously awarded to a range of organisations (Community Safety Partnerships and the Home Office Drugs Intervention Programme). Ring fences were removed to enable Commissioners to use the funding more freely. This grant funding is provided by the Ministry of Justice under powers given to the Secretary of State by section 56 of the Domestic Violence, Crime and Victims Act 2004 (DVCVA 2004). This provides that the Secretary of State may “pay such grants to such persons as he considers appropriate in connection with measures which appear to him to be intended to assist victims, witnesses or other persons affected by offences”.

Commissioners also have a duty to invoke the voice of the public, the vulnerable and victims. From October 2014, PCCs have been responsible

for the local commissioning of victims' services. This is aligned with the Ministry of Justice who hold a number of national contracts with providers for services including the national homicide service and the witness advice service at court. There is ongoing dialogue between PCCs and ministers regarding the best approach to devolution of service commissioning.

The community safety duty and the criminal justice duty put responsibilities on PCCs to work with partners to prevent and tackle crime. The statutory duties are deliberately broad and flexible, to allow working arrangements to develop in a way that is most meaningful locally. The aim of the duties is to ensure that the investment and prioritisation decisions taken by both Commissioners and their partners are made with a full understanding of the implications for all partners. The Commissioner must also be a 'Relevant Partner' in the Children and Young People's Partnerships and is responsible for ensuring these functions are discharged efficiently and effectively.

Commissioners also have duties under the Victims' Code of Practice¹; they must ensure that victims have access to Restorative Justice at all stages of the criminal justice service. Each Commissioner must determine how best to deliver victim based Restorative Justice services. Community Rehabilitation Companies are responsible under their Target Operating Model with the Ministry of Justice for delivering offender based Restorative Justice; the Services Agreement under this model has been designed to allow Commissioners to commission victim based services directly from Community Rehabilitation Companies without having to procure these services through a normal open competition tender process.

Police and Crime Plan

Each Police and Crime Commissioner is required to set a Police and Crime Plan, reflecting the key opportunities risks and challenges to policing and setting out their priorities for the term of office. The priorities of the Police and Crime Plan 2021 – 2025 are:

- Victims are supported

¹ this Code is issued by the Secretary of State for Justice under section 32 of the Domestic Violence, Crime and Victims Act 2004. It implements relevant provisions of the EU Directive 2012/29/EU establishing minimum standards on the rights, support and protection of victims of crime; Directive 2011/92/EU combating the sexual abuse and sexual exploitation of children; and Directive 2011/36/EU preventing and combating the trafficking of human beings.

- Harm is prevented
- Our justice system is more effective

Supporting these priorities are a number of key values:

- Working together
- Being accountable
- Being sustainable
- Engaging widely

Policing Protocol

Aligned to the above duties is the Policing Protocol Order 2011, issued by the Secretary of State and setting out the roles and responsibilities of all PCCs, Chief Constables and others.

The Office of the PCC monitors compliance against the Policing Protocol. As part of this, the Commissioning team report against a number of key measures including:

- Percentage of commissioned services demonstrating positive outcome data for service users
- Number of complaints received by the PCC regarding commissioned services provision
- Tender process should include consideration of the accessibility of service provision
- Requirement for awareness raising/production of publicity information should be included in all contracts
- Ensure delivery of victim services in accordance with terms and conditions of the Ministry of Justice grant
- Percentage of services receiving quarterly review meetings
- Percentage of performance reports received within 10 working days of quarter end
- Number of site visits of commissioned services
- Quarterly Commissioning Advisory Board meetings to be held

A report on these measures is produced quarterly to the Police and Crime Panel.

Approach to Commissioning

Commissioning should focus on securing the best outcomes, at the best value and ensuring continuous review of whether services achieve success in addressing the needs of victims or offenders of crime.

Successful commissioning is not simply based on budgetary decisions but should encompass a full range of partnership working and assessing the range of services available to secure better outcomes as well as securing value for money. Measuring success should be based not on the number of users receiving a particular service but on improved outcomes based on the ability of victims or offenders to return to a previous or improved quality of life.

The diagram below outlines the cycle of commissioning, which focusses on four stages:

- Understand– recognise the outcomes to be achieved and local needs
- Plan – map out and consider how the needs can be addressed effectively, efficiently and sustainably
- Do - accountable, open and transparent commissioning
- Review – ensure services are accountable by continuous monitoring of delivery against agreed outcomes



When interpreting and using this cycle, it is important to understand that:

- the cycle is never closed and can be influenced by success or failure;
- the model is not prescriptive about the length of time to achieve success; this might take time;
- stages of the cycle are dynamic rather than fixed;
- the commissioning cycle is intended to be a continuous improvement process with learning and feedback from each complete cycle feeding into improving the next.

The Government is working to improve commissioning to get the best possible services that deliver value for money. The National Audit Office has outlined eight principles of good commissioning that should result in better public outcomes for individuals and communities:

1. Understanding the needs of users and communities;
2. Consulting potential provider organisations, including those from the third sector and local experts, well in advance of commissioning new services;
3. Putting outcomes for users at the heart of the strategic planning process;

4. Mapping the fullest practical range of providers with a view to understanding the contribution they could make to delivering those outcomes;
5. Considering investing in the capacity of the provider base, particularly those working with hard-to-reach groups;
6. Ensuring contracting processes are transparent and fair, facilitating the involvement of the broadest range of suppliers, including considering sub-contracting and consortia building, where appropriate;
7. Ensuring long-term contracts and risk sharing, wherever appropriate, as ways of achieving efficiency and effectiveness; and
8. Seeking feedback from service users, communities and providers in order to review the effectiveness of the commissioning process in meeting local needs.

National Audit Office Successful Commissioning Toolkit.

Commissioning Principles

The Commissioner publishes an annual commissioning framework directly aligned to the Dyfed Powys Police and Crime Plan 2021-2025 with all commissioning intentions, along with the budget, linked to the strategic priorities contained within.

The Commissioning Framework outlines the key principles, potential commissioning routes, monitoring arrangements for commissioned services and outcomes, reporting, risk management and budget allocation.

The priorities set out in the Plan inform the PCC's decisions as to what funding is made available to the police and partners to achieve reductions in crime and disorder. The Commissioning Framework supports the PCC's intention to align the commissioning budget with those key themes and strategic priorities.

The priorities of the Police and Crime Plan and the commissioning framework are:

- 1) Victims are supported
- 2) Harm is prevented
- 3) Our justice system is more effective

Key Principles

There should be a focus on value for money, maximising resources and ensuring the impact of the money spent is measured and the value is assessed.

Best practice in relation to procurement will be applied. The PCC expects all procurement processes to follow best practice and be accessible for any provider, including the voluntary sector. All relevant regulations and legislation will also apply including the Equalities Act 2010 which includes the Public Sector Equality Duty.

The Director of Commissioning has designed a transparent and accessible commissioning process. Lower value services are commissioned via the Office of the Police and Crime Commissioner (OPCC) enabling a simple and user-friendly tendering process which reduces the burden on those submitting bids. The PCC has committed to ensuring that services represent the best quality and value for money. To achieve this, the evaluation process focuses strongly on quality as well as cost.

In all award decisions, we will consider the impact that awarding the funding will have on opportunities for people to use the Welsh language. This is contained both in procurement tender processes and within the scoring matrix for grant awards.

Joint/co-commissioning opportunities will be explored wherever possible to ensure that the benefits and added value of partnerships are fully considered.

Wherever feasible, the aim should be to award mid to long term contracts in order to ensure sustainability of service provision and to avoid the instability that accompanies short term or annual funding cycles.

Commissioning routes

Direct commissioning

To ensure that the PCC procures services which contribute towards achieving the priorities within the Police and Crime Plan, the PCC will directly tender or contract with a provider. This will be achieved through

open competition where bidders are invited to tender for services that meet the required objectives and outcomes within a dedicated service specification.

Co-commissioning

Where appropriate, the PCC will work with partners and providers to secure the most effective and cost-efficient outcomes from service delivery. This may be achieved via both established and emerging commissioning structures and partnerships with key stakeholders.

Grants

The PCC will make various grants programmes available. Some will be open to partners in support of their work on shared objectives across both organisational and geographical boundaries. Others will be open to charities, voluntary organisations and community groups, with the aim of improving local communities and the lives of the people that reside within them.

Grants will be awarded based on set criteria which include consideration of the community benefit, the evidenced need for the project, accessibility, how the project meets the priorities and value for money.

The Grant process, along with scoring matrix, is included for reference at Appendix 1.

Other

In addition to this, there will be opportunities throughout the year to bid for various competed funds from the Home Office and the Ministry of Justice. An opportunities register will be established by the External Funding Manager in order to capture potential project ideas and to identify areas of evidenced need. This will ensure that we maximise all opportunities for service development where appropriate.

For all funding mechanisms the PCC will hold contracts/service level agreements with the successful organisations that specify the detail of the outcomes to be delivered and the value.

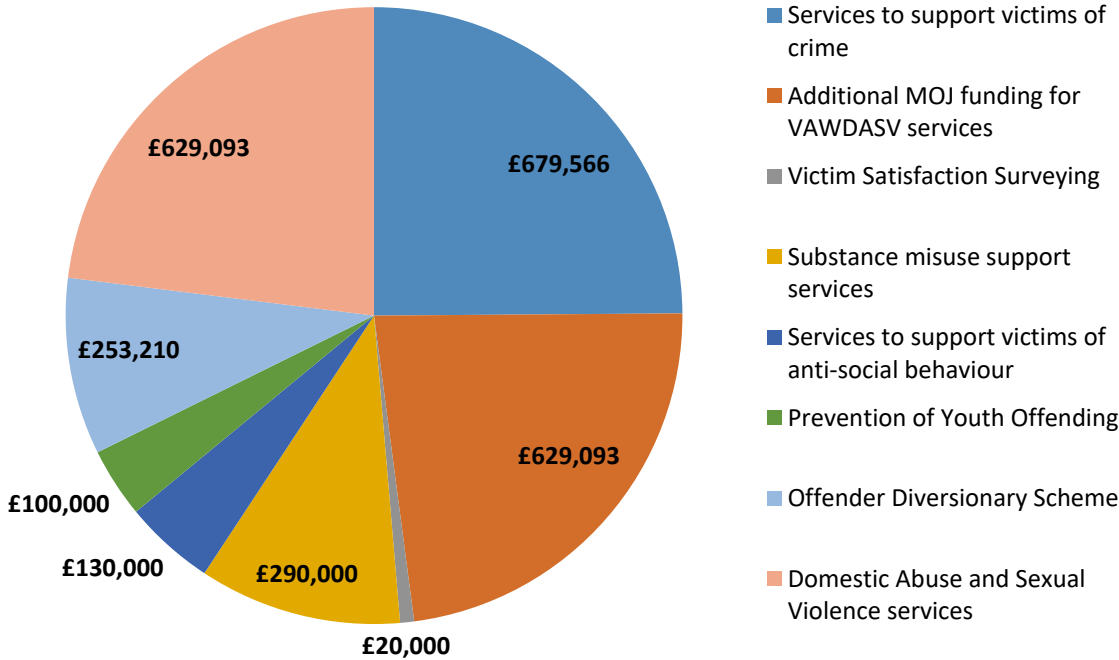
Commissioning Budget

The total commissioning budget consists of a grant from the Ministry of Justice (MOJ) for the purpose of commissioning victims' services along with an allocation from the PCC's core funding. The MOJ victims' grant is allocated according to a population based funding formula. Its purpose is to fund first point of contact victims' services, sexual violence, domestic violence and child sexual abuse services as well as services to support victims of other crime types as required.

The Commissioning budget for 2021/22 was £3,022,430, which included staff costs in addition to costs incurred for direct service provision. This includes the MOJ grant, to a value of £605,586. During the year the PCC secured additional funding to the value of £629,093 to support victims of violence against women, domestic abuse and sexual violence. This includes increased numbers of Independent Domestic and Sexual Violence Advisors as well as further capacity for specialist community services.

The graph below demonstrates the percentage of the core budget allocated to areas of activity:

2021/22 Commissioned Service Budget



The below table provides further information regarding the commissioning expenditure and the route of provision:

Commissioning area	PCP Priority	Funding Mechanism	Amount 2021/22 (£)	Comment
Substance Misuse	1, 2	Joint commissioning	290,000	Provision of substance misuse treatment services for those entering the criminal justice system
Antisocial Behaviour	1, 2	Direct	130,000	Provision of services for the support, referral, and reduction of antisocial behaviour
Prevention of Youth Offending	1, 2	Grants	180,122	Identification of those at risk of offending and provision of bespoke support packages
Victims' referral service	1, 2	Direct	237,579	Provision of a victim referral service for all victims of crime who reside in Dyfed Powys
Victim Satisfaction	3	Direct	20,000	Telephone surveys of victims of domestic abuse as mandated by the Home Office
Domestic Abuse	1, 2	Joint Commissioning	200,000	<ul style="list-style-type: none"> Service providing support to high risk victims of domestic abuse

Sexual Abuse	1, 2	Direct	136,987	<ul style="list-style-type: none"> • Provision of 24 hour access to crisis support for victims of sexual assault with specialist clinical and forensic care and ongoing support • Provision of support for victims of child sexual abuse • Peripatetic ISVA provision across rural areas
MOJ uplift for VAWDASV services	1,2	Grants	629,093	<ul style="list-style-type: none"> • Increased IDVA provision • MOJ ISVA uplift <p>Uplift capacity for community services</p>
Children at Risk of Sexual Exploitation	1, 2	Direct	80,000	Provision of an independent debriefing and mediation service for children and young people who have been reported as missing
Diversiory scheme for offenders	1, 2, 3	Direct	253,210	Provision of a triage and diversionary support service for low level offenders

Procurement process

The Commissioning team have produced a simple guide to procurement regulations. This contains guidance regarding whether the process should be procurement or a grant, thresholds, authorisation, governance and exemption rules in line with the Corporate Governance Framework.

The Force's Procurement department undertake a supplier capability questionnaire as part of the due diligence during any formal tender process. This includes some grounds for exclusion where providers have been found guilty of conspiracy, corruption, fraud etc. It also ensures that they have the required levels of insurance, Dun & Bradstreet financial checks, Health and Safety compliance, compliance with other applicable laws, policies and procedures, prior contract history and evidence of delivery. The Finance department will also undertake fraud and other risk assessments when setting up new suppliers.

Contracts

Following tender award, a contract is in place with each service (based on the terms and conditions used by Dyfed Powys Police Procurement), which includes the service aim and objectives, key performance indicators (KPIs) and performance/financial reporting arrangements. An excerpt is provided below:

The Provider will be expected to work with the Commissioner throughout the duration of the contract to further develop the framework of measurable outcomes for the Services. As a minimum, each of the following KPIs shall be measured on a quarterly basis.....

The Provider shall ensure that it has appropriate systems and procedures in place in order to capture and report on compliance with KPIs as required.

Within 10 working days after the end of each Quarter, the Provider shall deliver to the Commissioner a management report detailing performance in respect of each KPI during that Quarter. Reports shall be in the format proposed by the Provider and approved by the Commissioner and shall include narrative to highlight any performance issues, along with steps that the Provider proposes to take to avoid any recurrence of the problems. The report should also

contain other relevant performance information and any pertinent issues or areas requiring further discussion.

Monitoring will be undertaken via quarterly meetings/visits. The quarterly reports submitted by the Provider will form the basis for discussion at these meetings. The meeting will afford both parties the opportunity to raise any issues for discussion or clarification.

Monitoring visits will allow the Commissioner to experience the service being delivered and to review service user experiences and satisfaction levels.

As part of these contract conditions, providers submit quarterly reports. These include performance data, case studies, any complaints or compliments received, training, staff/recruitment updates, any issues to escalate to commissioners, along with a narrative update on progress during the quarter.

Data provided within these reports is transferred into a performance dashboard that the commissioning team hold. This provides an ongoing assessment of performance over time and against key indicators.

Contract review meetings are held quarterly with each provider and, where jointly commissioned, with representatives from other commissioning parties.

As per the contract agreements, providers are required to submit end of year financial statements showing actual outturn expenditure within 30 working days following 31st March each year.

Governance

According to the Police Reform and Social Responsibility Act 2011 the Commissioner must decide the principles of their approach to commissioning, the desired outcomes, the monitoring and reporting requirements for commissioned services and the budgets involved – this is outlined in our Commissioning Framework as described earlier.

Two areas of the Corporate Governance Framework are particularly pertinent; firstly the guidance around decision making and secondly the procurement regulations. All decisions made by the Commissioner are recorded in a decision log, published on the website and reported to the Police and Crime Panel accordingly.

Commissioning Advisory Board (CAB)

The Commissioner has established a Commissioning Advisory Board, whose role is to act as the reviewing body in relation to the awarding of grant funding and the tendering of services. Their role includes ensuring that there is a return on investment and evaluation of service impact. The Board focuses on scrutinising activity and holding service providers to account.

The Commissioning Advisory Board Terms of Reference include:

- provide advice to the Police and Crime Commissioner with regard to the Commissioning Framework and the commissioning intentions within his Police and Crime Plan & Delivery Plan
- make recommendations about investment and disinvestment required to deliver service development and strategic planning priorities
- consider a variety of options for investment in services
- oversee the outcome and monitoring arrangements for delivery of services against the Police and Crime Plan & Delivery Plan, including effective performance monitoring frameworks, targets and reporting structures
- consider for approval recommendations made by the External Funding Manager with regard to bids received into the Commissioner's various funding allocations

As part of the Board's activity, providers are asked to routinely attend to present to Board members regarding individual service delivery. Providers also take part in discussions around particular topics such as the experience of delivery during the Covid 19 pandemic. All providers attend approximately once every 2 years to present; as part of this, the Board are provided with an overview of the service from the commissioning team, a presentation by the provider followed by a Q&A session.

As a result of discussions at CAB, the commissioning team has produced single page overview documents of each service outlining the contract purpose, provider, cost, duration and key deliverables/outcomes from the services. These are included on the OPCC website [here](#) for wider public awareness of delivery against investment.

Monitoring Commissioned Services and Outcomes

The intention of the Dyfed Powys PCC is to commission services that can deliver and demonstrate clearly defined outcomes. It will be the PCC's responsibility, through the Office of the Police and Crime Commissioner, to monitor progress for each commissioned activity against the proposed outcomes.

Outcomes for each contract awarded are developed based on the aims and objectives of the service. Beneath the agreed outcomes are a variety of performance indicators which may include qualitative and quantitative measures, restorative measures and payment by results measures, all based on the service contract. Performance indicators are discussed with the provider to ensure that they are achievable. Providers are expected to work with the Commissioner throughout the duration of the contract to further develop the framework of measurable outcomes for the services. Having these measures in place enables the PCC to hold the service provider to account for the successful delivery of the contract and monitor progress through the lifetime of the contract.

Reporting

Intelligent monitoring and reporting means that we can engage with our service providers to ensure that information sought is realistic based on the commissioning purpose/context and the scope and timescales of the project.

Monitoring methods are underpinned by how the information is to be used – whether to understand the overall impact of the commissioned service, to develop and improve practice, to influence public policy or to prepare for future commissioning.

Monitoring of services will provide the PCC with a tool for understanding success and failure, what works and what does not and the difference the services are making.

Quarterly performance monitoring meetings are held with all service providers. All providers are requested to capture and measure performance indicators on their own systems internally, ensuring they are accountable and in control of their own monitoring / reporting.

Further information is provided within the Audit section that follows later in this strategy.

Risk Management

Service provider obligations with respect to employment of staff, safeguarding and other relevant legislation are clearly defined within contract documentation. This includes clauses relating to indemnity and insurance requirements.

Service providers manage their own risk throughout the duration of the contract and update the PCC on any issues that arise that are likely to affect the outcome of the contract. This is also embedded within the original procurement exercise, where bidders are required to identify potential risks and propose mitigating actions.

The Commissioner has a statutory responsibility to represent the voice of victims. The impact therefore of not commissioning victims' services would breach this responsibility and impact negatively on public confidence levels and service delivery. Likewise the impact of not ensuring the provision of services to address wider community safety concerns is likely to increase crime, disorder and offending and impact negatively on the quality of life within communities and public confidence.

Commissioned Services Audit Plan

Ministry of Justice grant

The terms and conditions of the Ministry of Justice (MOJ) grant require a number of due diligence criteria to be met, along with mid-year and end of

year submissions of data and outcomes from the services who receive funding. The requirements for utilisation of the grant include:

- Providing or commissioning support services for:
 - victims of crime
 - family members
 - victims of sexual violence
 - victims of domestic violence
 - victims of child sexual abuse (CSA) or exploitation
- Building the capacity and capability of providers of support services for victims of crime and family members (including providers of restorative justice services) from the Voluntary Community and Social Enterprise (VCSE) sector
- Covering any associated costs that arise in the process of commissioning or providing support services with the grant
- The CSA uplift element of the grant must only be used for the following purposes:
 - Providing or commissioning support services for victims of child sexual abuse or exploitation
 - Covering any associated costs that arise in the process of providing or commissioning such services with the grant; and
 - Building the capacity and capability of providers of support services for victims of child sexual abuse and exploitation from the VCSE sector
- Services in the PCC area satisfy the requirements of the Victims' Directive, establishing minimum standards on the rights, support and protection of victims of crime:
 - Meet the support needs of victims or, as the case may be, family members
 - Act in the interests of the victims or family members supported
 - Be free of charge
 - Be confidential
 - be non-discriminatory (including being available to all regardless of residence status, nationality of citizenship)
 - Be available whether or not a crime has been reported to the police
 - Be available before, during and for an appropriate time after any investigation or criminal proceedings
 - Support services provided or commissioned with the Grant must include a referral service

- Ensure that adequate single point of contact (SPOC) arrangements are put in place in their police area so that victims of major crime incidents, and family members, resident in their police area are able to straightforwardly and speedily access support services funded with the grant.
- Support Services provided or commissioned with the grant are widely publicised in a variety of media and locations.
- Recipient must specify the victims' services to be commissioned or provided, including referral services, in any Police and Crime Plan and Annual Report they issue/produce
- The grant must be audited as part of the recipient's annual audit programme. Accounts must be audited and funding from the grant must be clearly identified separately
- Any capital assets costing more than £1000 which have been purchased are maintained and registered
- The Recipient must ensure that all its staff members comply, and take all reasonable steps to ensure that any other person involved in the use of the grant complies, with all applicable laws in force in England and Wales
- Followed government guidance on COVID-19 extraordinary grant funding for Police and Crime Commissioners and spend is only used between specified dates

The organisations in receipt of the MOJ funding via the PCC are required to provide outcome measurements on the following areas:

- Number of victims referred
- Number of victims supported
- Average length of time spent by victims on the waiting list
- Eligible: No Contact
- Eligible: Disengaged
- Demographics:
 - Gender
 - Age
 - Sexual orientation
 - Ethnicity
 - Disability

Auditing services

As outlined within this strategy, there are numerous processes in place that serve to monitor the value and outcomes delivered by services funded by the PCC. To complement this, a desktop review is undertaken on an annual basis for each commissioned service. This includes:

- Performance reports –received each quarter in a timely manner
- Contract meetings – held quarterly and minutes available. Actions up to date and completed
- Positive progress demonstrated on key performance indicators
- Value for money
- Finance reporting – are there any concerns regarding the provider organisation? Are invoices provided in a timely manner? Are end of year financial statements provided?
- Complaints procedure in place and publicly available
- Staff welfare – (OPCC will attend 1 team meeting per year to meet with staff and discuss any concerns)
- Vetting – all required staff have up to date vetting approval
- Policies in place as per contract requirements
- Data processing or information sharing arrangements in place where necessary
- Welsh Language provision
- Volunteers – are they used in service delivery and, if so, are the correct policies in place?

A more detailed audit is undertaken for those services where contracts are due to end, in order to inform recommissioning plans. These are timetabled in line with end of contract deadlines. This includes a review of the following in addition to the annual review information:

- Business continuity plan
- Internal Quality Assurance
- Inspections and outcomes
- Job descriptions and recruitment policy
- Training plan and staff training log
- Freedom Of Interest etc. requests / activity
- Safeguarding
- Incident reports
- Partnership / stakeholder maps/engagement plans
- Communication plan
- Evidence of service user engagement

- Random sample of service user files
- Interview of Service Users / feedback through Victim Engagement Forum

Communications

The Commissioning team regularly provide information for the public and partners via press releases, social media and articles in national publications. In addition to this, the PCC's website includes a section on services available to the community [here](#). This provides a description of each service along with contact details. This page also contains an overview document showing contract information, key statistics and outcomes delivered by each of our commissioned services.

A hard copy leaflet of services has also been produced and is used at all community events where the PCC/OPCC are present.

Needs Assessments and Review of Services

In January 2019 the PCC commissioned a Needs Assessment of victims and vulnerable people. The Executive Summary from this is attached at appendix 2. Appendix 3 contains an overview of the key recommendations emerging from the assessment, along with the PCC's response and required actions. This has been further updated with a position statement for the most current situation.

There are a number of requirements for ongoing action emerging from the needs assessment, which are outlined below:

- Sustained engagement with Public Service Boards
- Progress opportunities for joint commissioning with partners in particular the National Probation Service
- Child victim service
- Ongoing review of the business benefits of investment into the fraud and economic crime team
- Oversight of progress of the end to end crime project
- Focus on provision of Restorative Justice services and information sharing

- Continued progress of regional delivery of sexual abuse services and lobbying for additional funding for counselling
- Continued investment into early intervention and prevention work including evidence base of investment into Youth Offending provision

In November 2019 an independent review was undertaken of the Goleudy Victim and Witness Service in Dyfed Powys. Appendix 4 contains the key recommendations, with a response provided by Dyfed Powys Police and further comments added from the PCC's perspective.

Again, this work leaves a legacy of issues that will require ongoing action and monitoring, summarised below:

- Goleudy contact methodology to remain under review, to be discussed in quarterly contract management meetings
- Longer term discussions required to address mitigation of high turnover rates
- Restorative Justice to be taken forward as a priority under the working group for joint commissioning between PCCs and National Probation Service
- Use of volunteers for service delivery will form part of annual audit of commissioned services
- Training plans to be considered as part of annual audit plans
- Goleudy management information to form part of ongoing discussions regarding new records management system
- A number of issues that will sit under Victim and Witness sub group as standing agenda items, including performance management measures and victim satisfaction /feedback
- Publicity and marketing to be a continuous focus for Force and OPCC communications teams

Appendix 1: Process for grant funding applications to PCC

April 2020 onwards

Amount	Application process	Authorisation required by	Considerations met	Terms and Conditions	Monitoring – performance	Monitoring - financial
Under £500	<ol style="list-style-type: none"> 1. Complete proforma - Engagement officers or Force 2. Ensure oversight by appropriate Chief Officer to endorse in line with organisational policy (for Force requests only) 3. Submit to Commissioning and Grants team 4. Commissioning team log on spreadsheet 5. External funding manager allocate budget based on priorities and criteria 6. Commissioning and Grants team to send Donation acceptance form to organisation for completion 7. Complete decision log template and associated translation, upload to 	PCC – to be endorsed via reports to fortnightly OPCC Exec Team	Proforma confirms no conflict with Police and Crime Plan, no conflict of interest, no reputational damage etc.	Donation only	Donations publicised on website via decision logs	

	<p>website etc. (see decision log policy)</p> <p>8. Commissioning team complete BACS form – to be signed by DoC</p>					
<p>£500 to £1,500</p> <p>Requests internal & external</p>	<ol style="list-style-type: none"> 1. Complete proforma - Engagement officers or Force 2. Ensure oversight by appropriate Chief Officer to endorse in line with organisational policy (for Force requests only) 3. Submit to Commissioning and Grants team 4. Commissioning team log on spreadsheet 5. External funding manager allocate budget based on priorities and criteria 6. Commissioning and Grants team to send Donation acceptance form to organisation for completion 7. Complete decision log template and associated translation, upload to website etc. (see decision log policy) 	<p>PCC – to be endorsed via reports to fortnightly OPCC Exec Team</p>	<p>Scoring matrix</p>	<p>Donation only</p>	<p>Reported to Commissioning Advisory Board (CAB)</p> <p>Site visit – complete template</p> <p>Consider press release</p>	<p>Reported to CAB</p>

	8. Commissioning team complete BACS form – to be signed by DoC					
£1,500 - £4,999 Requests internal & external	<ol style="list-style-type: none"> 1. Complete proforma - Engagement officers or Force 2. Ensure oversight by appropriate Chief Officer to endorse in line with organisational policy (for Force requests only) 3. Submit to Commissioning and Grants team 4. Commissioning team log on spreadsheet 5. External funding manager allocate budget based on priorities and criteria 6. Commissioning and Grants team to send Donation acceptance form to organisation for completion 7. Complete decision log template and associated translation, upload to website etc. (see decision log policy) 8. Commissioning team complete BACS form – to be signed by DoC 	PCC – to be endorsed via reports to fortnightly OPCC Exec Team	Scoring matrix	Single page grant agreement	<p>Reported to CAB</p> <p>Site visit</p> <p>Single page outcome report to be provided by recipient</p>	<p>Reported to CAB</p> <p>Request back up invoices / timesheets as evidence of spend</p>

<p>£5000 - £24,999</p> <p>Planned grant allocation i.e. Commissioner's Community Fund or internal business case</p>	<p>Internal:</p> <ol style="list-style-type: none"> 1. Project proposal completed by applicant 2. Signed by authorised officer as per delegated authority in Corporate Governance Framework (CGF) 3. As per CGF reported to COG and onwards to PB for decision 4. External Funding Manager to allocate budget based on priorities and criteria 5. Complete decision log and associated requirements (if discussed at Policing Board, minutes act as decision log) 6. Commissioning team record on central spreadsheet <p>External:</p> <ol style="list-style-type: none"> 1. Completion of application form by applicant 2. Submit to Commissioning team (via Commissioning email inbox) 3. Commissioning team register application and 	<p>PCC – to be endorsed via reports to fortnightly OPCC Exec Team</p>	<p>Scoring matrix</p>	<p>Grant agreement</p>	<p>Reported to CAB</p> <p>Outcome monitoring report as detailed in grant agreement</p> <p>Site visit</p>	<p>Reported to CAB</p> <p>Invoices with accompanying backing evidence i.e. invoices incurred or timesheets</p> <p>Completion of claim form as per grant agreement</p>
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	<p>undertake background checks (to include charity commission etc.) – see Procurement regulations.</p> <ol style="list-style-type: none"> 4. Scored on matrix and considerations checked by External Funding Manager 5. Recommendation to PCC for approval or otherwise via Exec Team report 6. Commissioning team complete decision log and associated requirements 7. External Funding Manager provides grant agreement for signature by applicant 					
£25,000 and over	<p>Internal:</p> <ol style="list-style-type: none"> 1. Project proposal completed by applicant 2. Signed by authorised officer as per delegated authority in Corporate Governance Framework (CGF) 3. Submitted for consideration by Change and Transformation Group 4. As per CGF reported to COG and onwards to PB for decision 	<p>PCC – to be endorsed via reports to fortnightly OPCC Exec Team</p>	<p>Scoring matrix</p>	<p>Grant agreement</p>	<p>Providers to present to CAB</p> <p>Outcome monitoring report as detailed in grant agreement</p> <p>Site visit</p>	<p>Providers to present to CAB</p> <p>Invoices with accompanying backing evidence i.e. invoices incurred or timesheets</p> <p>Completion of claim form as</p>

	<p>5. External Funding Manager to allocate budget based on priorities and criteria</p> <p>6. Complete decision log and associated requirements (if discussed at Policing Board, minutes act as decision log)</p> <p>7. Commissioning team record on central spreadsheet</p> <p>External:</p> <p>1. Completion of application form by applicant</p> <p>2. Submit to Commissioning team (via Commissioning email inbox)</p> <p>3. Commissioning team register application and undertake background checks (to include charity commission etc.) – see Procurement regulations.</p> <p>4. Scored on matrix and considerations checked by External Funding Manager</p> <p>5. Recommendation to PCC for approval or otherwise via Exec Team report</p>					<p>per grant agreement</p>
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	<p>6. Commissioning team complete decision log and associated requirements</p> <p>7. External Funding Manager provides grant agreement for signature by applicant</p>					
Note: Commissioned services	In line with Procurement regulations via Sell2Wales	In line with Procurement regulations	In line with Procurement regulations	PCC contract T&Cs	<p>As per Annex B of contract:</p> <ul style="list-style-type: none"> • Quarterly performance reports • Quarterly contract monitoring meetings • Site visits 	<p>Invoices only authorised once quarterly performance report is received and meeting held.</p> <p>As per Annex C of contract: Provider shall submit end of year financial statement showing actual outturn expenditure.</p>

Note: All press releases / PR activity to be recorded on the grants spreadsheet for reporting via Commissioning KPIs under Policing Protocol

Relevant extracts from Commissioning Advisory Board Terms of Reference:

Meeting purpose:

The PCC for Dyfed Powys sets an annual budget in order to facilitate the commissioning of services. In addition to this, he has made available several funding programmes for partner organisations and communities to apply to, which will fund capital and revenue projects that support the vision of his Police & Crime Plan.

Meeting objective:

The Commissioning Advisory Board will act as the reviewing body for Dyfed Powys Police and Crime Commissioner advising him in relation to the awarding of grant funding or the tendering for services. This will include ensuring that there is a return on investment and evaluation of services impact.

The board will focus on scrutinising the business case review and holding service providers to account.

Deliverables:

- To consider a variety of options for investment in services
- To oversee the outcome and monitoring arrangements for delivery of services against the Police and Crime Plan & Delivery Plan, including effective performance monitoring frameworks, targets and reporting structures
- To receive appraisals, make recommendations and retain oversight regarding all potential business cases to secure additional funding into Dyfed Powys (to include Police Transformation Fund, Home Office / Welsh Government initiated funds, regional collaborative bids such as Violence Against Women etc.)
- To scrutinise approved allocation of grant funding from the PCC
- To ensure fairness and transparency in the decision making process and notify the Police and Crime Commissioner's Monitoring Officer of any unfair practice observed.

Relevant extracts from Corporate Governance Framework:

Section 4.3.9 Any grant applications, income recovery and charging issues, or any opportunities being considered, must be reported to COG and thereafter Policing Board for approval in advance of any detailed work being undertaken.

Section 6.3 The Role of the PCC’s Chief Finance Officer (CFO)

- 6.3.5 To enable the CFO to fulfil these duties and to ensure the PCC is provided with adequate financial advice, the CFO:
- must lead the promotion and delivery by the PCC of good financial management so that public money is safeguarded at all times and used appropriately, economically, efficiently and effectively; and

Section 11.3 Joint Working Arrangements / Partnerships

11.3.12 When the PCC acts as a commissioner of services, he/she will need to agree the shared priorities and outcomes expected to be delivered through the contract or grant agreement with each provider.

PCC	<ul style="list-style-type: none"> • To have regard to relevant priorities of local partners when considering and setting the Police and Crime Plan. • To make appropriate arrangements to commission services from either the Force or external providers. • To make crime and disorder grants.
Chief Officers	<ul style="list-style-type: none"> • To follow the Financial Procedures for local partnerships, as published on the Force intranet. • To consult, as early as possible, the DoF and the CFO to ensure the correct treatment of taxation and other accounting arrangements.

- | | |
|--|---|
| | <ul style="list-style-type: none"> • To produce a Memorandum of Understanding (MOU) setting out the appropriate governance arrangements for projects. This document should be signed by the CoS. |
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11.3.15 The PCC may commission services from other organisations as well as the Force in order to achieve the best outcomes at best value for the people of Dyfed-Powys.

Section 14.9 Form of Contract

14.9.1 Every contract shall be in writing. Where a contract exceeds £25,000 the contract shall be in a form approved by the CFO. Contracts whose value is less than £25,000 may be completed by use of an official order form accompanied by the PCC's standard terms and conditions. Verbal quotations will be evidenced in writing backed up by an appropriate order form.

Appendix 2: Dyfed Powys Needs Assessment 2019: Victims and Vulnerable Persons

Executive Summary

The Dyfed-Powys Police and Crime Commissioner (PCC) has statutory responsibilities to commission victim support services. The PCC commissions a universal victim support offer and other specialist support for victims at risk of repeat victimisation, victims of serious crimes and other vulnerable and intimidated victims. Working with partners, the PCC commissions support that:

- Delivers on the key aim of ensuring victims cope and recover
- Reduces and prevents repeat victimisation
- Supports vulnerable and intimidated victims participate in a support pathway that meets needs arising from their vulnerability at all stages in a criminal justice (CJ) process.

Taken together, these help drive improved victim satisfaction and wider public confidence in the CJ system. The PCC commissioned George Partnership Limited to prepare a Needs Assessment so that future commissioning and targeting of services make best use of resources and focus on primary needs. This will help to drive an evidence-led approach to future commissioning and partnership development and to understand where the PCC can best impact upon achieving support for more victims and vulnerable persons in collaboration with partners. A mixed method review was agreed with the Office of the PCC (OPCC), with data collection undertaken across January-February 2019.

Context

Dyfed-Powys is comprised of the local authority areas of Carmarthenshire, Ceredigion, Pembrokeshire and Powys, an area that covers over half of Wales. The population of Dyfed-Powys is more than 515,000. This includes more than 86,000 children and young people aged 0-15 years. Dyfed-Powys is generally a much older population than the rest of Wales and ageing fast. Rapid ageing of the Dyfed-Powys population is taking place alongside:

- Technological change
- UK Government led austerity
- Growing numbers of children and adults with mental health needs

- Legislative reforms including the Well-being of Future Generations (Wales) Act 2015, Violence Against Women, Domestic Violence and Sexual Abuse (Wales) Act 2015 (VAWDASV) and Social Services and Well-being (Wales) Act 2014
- A shared priority for better understanding and supporting those more vulnerable to escalating problems and entrenched disadvantage.

These developments herald much change in how public services across the statutory and voluntary and community sector (VCS) serve Dyfed-Powys residents. More focus than ever is on prevention and early intervention, with multiagency partners working together much more to integrate services and streamline support pathways especially for those at risk of escalating problems. This is consistent with best practice about what works for people who have experienced victimisation and/or are vulnerable to crime and repeat victimisation.

Most of this work is led through Public Service Boards (PSBs) in each of the 4 local authority areas and through regional arrangements for safeguarding children and adults, addressing VAWDASV, substance and alcohol misuse, supported housing and improving health and social care, including access to mental health services for children and for adults. These regional and local governance arrangements are increasingly the place to drive a more coordinated and cohesive support pathway for victims of crime and vulnerable persons.

Future commissioning of victim support services and crime prevention services will also have more impact through more integrated approaches that nurture collaboration between key statutory and voluntary sector partners. In this way, child and adult victims that are more vulnerable are identified earlier and have needs met in ways that suit them, including their Welsh language needs, rurality, mental health needs and disabilities, for example.

Emerging crime trends

Dyfed-Powys is comparatively much safer than the rest of Wales and England. Dyfed-Powys has less crimes per 1,000 people than all other police force areas in all offence categories for the year ending September 2018 (50.7 crimes per 1,000 people compared with an average across Wales and England of 86.4 per 1,000 peopleⁱ).

Crime trend analysis shows reducing levels of burglary, vehicle offences, criminal damage and arson and some types of theft. There have been small increases in drug offences and shoplifting, whereas public order offences and crimes of violence, including sexual violence and domestic abuse, have grown more significantly. Non-violent forms of domestic abuse are also increasing rapidly. Two other areas of key concern, which disproportionately affect older people and more vulnerable children and adults, are:

- Rapidly increasing levels of cyber-crimes (up 201% in the period April 2016- December 2018); and
- Fraud which accounts for half of all crime (and often goes unreported).

Victim profile

Dyfed-Powys Police data shows that half of all victim-based crimeⁱⁱ in Dyfed-Powys involves violence against the person (20,890 of 41,015 total offences). As one gets older, there is a reducing likelihood where one is a victim of crime that this involves violence:

- Children aged 0-11 years (70% of all offences affecting children aged 0-11 years involve violence)
- Children aged 12-17 years (60%)
- Individuals aged 18-29 years (60%), with more than 3 in 10 of all offences involving violence against the person in Dyfed-Powys affecting those aged 18-29.
- Individuals aged 30-35 years (56%)
- Individuals aged 36-47 years (50%)
- Individuals aged 48-59 years (42%)
- Individuals aged 60+ (27%), with a little more than 1 in 20 of all offences involving violence against the person affecting those aged 60+.

Victim-based crime is more likely to affect people aged 18-35 years in Dyfed-Powys (close to 2 in 5 of all offences), and while the likelihood of experiencing victimisation generally reduces as one gets older, those aged 60+ account for 12% of all victims (and 14.4% of all male victims).

Of all victim-based crime, 53% are recorded as 'female' and 47% are 'male'. Females are more likely recorded as victims through ages 12- 47 years, whereas males are more likely recorded as victims aged 48+. This

is driven by sexual offences (more than 4 in 5 of all victims are female) and other crimes of violence against the person (11 in 20 of all victims are female). While vehicle offences account for 4% of victim-based crime, males appear more likely the victim (close to 7 in 10 of all victims of vehicle offences are recorded as male). Similarly, residential burglaries account for 4.8% of victim-based crime with males appearing more likely victims (with 11 in 20 of all victims recorded as male). It is not known however, whether this relates simply to the individual who first reports on behalf of a family for example. More than 1 in every 4 residential burglaries also affect people aged 60+ in Dyfed-Powys.

As one gets older, there is more likelihood that where one is a victim of crime this involves theft and arson and criminal damage. While theft accounts for 11.7% and arson and criminal damage accounts for 14.8% of all victim-based crimes, these offences combined account for more than 1 in 3 of offences affecting individuals aged 48-59 and close to half of offences affecting people aged 60+. By contrast, these account for 1 in 5 offences affecting individuals aged 18-29 and less than 1 in 10 offences affecting children aged 12-17.

Children aged 0-17 years are less likely to be victims of crime, representing 15.2% of victims. Sexual offences account for 6.4% of all reported victim-based offences, with children aged 0-17 years representing 63% of these offences (1,558 of 2,485 offences, where the victim's age is known). This disproportionately affects girls (approximately 4 in 5), especially girls aged 12-17 years.

Where ethnicity of a victim is known, 98.5% are White Europeans (of which this overwhelmingly is White Welsh and White British people). Just under 1% of all victims are Asian, 0.5% of victims are Black and 0.2% are Arabic or North African.

Key cohorts for more specialist and targeted support

For victims of more serious crimes and/or because of other vulnerabilities someone has, such as previous victimisation and the effects of traumas associated with adverse childhood experiences (ACEs), some will have multiple needs which require a multiagency approach to help coping and recovery from crime. In addition to an increasing focus on preventing and supporting those affected by fraud, the Needs Assessment identifies that the key cohorts where more specialist victim-support provision work is required are:

- More vulnerable children and young people, especially those affected by county lines activity, at risk of exploitation (e.g. through county lines, online media and who go missing repeatedly) and who are affected by multiple ACEs.
- Victims of domestic abuse and sexual violence, with rapidly increasing levels of domestic abuse and sexual violence and far too little provided by partners to address the therapeutic needs of victims.
- Working with Area Planning Boards (APBs) and PSBs to ensure effective drug and alcohol services, both because people with drug and alcohol problems experience more crime and to reduce offending associated with drug and alcohol problems.

Lessons from current commissioning

Victims of crime experience a range of emotional and practical problems as a result of crime. Best practice tells us that victims of crime need timely and accurate information in formats that suit them. This helps to assist with coping with the impact of victimisation and to sustain participation with CJ processes. As criminal victimisation is a highly personalised experience, not all victims require access to the same services at the same time.

Mostly, victims of crime have their emotional and practical support needs met within their own families and communities, with a significant proportion finding their needs are met through front-line victim support services commissioned by the PCC. Significant redesign of front-line victim support services has taken place in Dyfed-Powys with the introduction of Goleudy. For the year ending November 2018, the Force achieved a 'whole experience' satisfaction rate for victims of crime of 77.4%. For the next stages of Goleudy's development, improving awareness of the service and to ensure all prospective victims are aware of existing support are the main recommendations. It is also a pressing priority to have robust performance reporting in place. This will make more transparent the extent to which victim needs are met.

The PCC has funded a diverse range of more specialist and targeted victim support and crime prevention services too. The services have many characteristics associated with good quality (e.g. appropriately qualified staff, recognised quality assurance systems and using evidence based approaches) and are making a difference for the people that use them.

An overriding strength of current arrangements is that those using PCC funded specialist and targeted victim support and crime prevention services are very positive about their experiences in accessing support. This was especially evident in feedback through interviews and focus groups with service users engaging with Independent Domestic Violence Advisors (IDVAs), Independent Sexual Violence Advisors (ISVAs), drug and alcohol services delivered by Dyfed Drug and Alcohol Services and from the custody diversion pilot. They were highly complementary about the quality of their relationships with these services and most particularly, the level of staff knowledge, skills and confidence. They also identify a range of positive impacts for themselves from taking up the support.

Other key areas of strength from current commissioning include:

- Developing more equitable and consistent IDVA provision across the region, with a collaborative approach involving Hafan Cymru and Pobl (Gwalia).
- The youth offending teams (YOTs) effectiveness in reducing first time entrants into the CJ system and supporting victims of crime. This is especially true for children and young people aged 10-13 years with multiple ACEs where YOTs can evidence reducing offending by 50% (2 years post intervention).
- Across the 2 commissioned substance misuse services, there is more than £1.5m annual savings for public sector agencies from reduced drug and alcohol use and reduced offending, with over 50% of the savings accruing to CJ partners. In addition, the CJ substance misuse services are integrated into the wider service offering for people with substance and alcohol needs, with specialist prison link workers playing a critical role in facilitating safe transition of offenders with drug and/or alcohol problems into the community.
- A willingness to innovate, so building on an earlier pilot for female offenders to make available a custody diversion pilot for example. While early days, it is encouraging that of 36 people that have completed contracts, 87% have not committed any further offences.

Key areas for improvement relate to:

- Working with partners especially Hywel Dda University Health Board, Powys Teaching Health Board and through the PSBs and APBs to address the challenges victims of crime and individuals with drug and/or alcohol problems have in accessing support for their mental

health problems. There is a specific priority in making available more therapeutic support for victims of sexual violence, including children and young people as an immediate priority.

- Ensuring that all victims of sexual violence have opportunities for specialist provision through the SARC.
- Helping overcome insufficient and fragmented support for domestic abuse victims leading into and within court processes, which impact victim engagement with CJ processes. At the same time, victims of domestic abuse have wide-ranging support needs that are not consistently well met by partners.
- Helping overcome the low levels of victim participation with the restorative justice offer through applying best practice approaches. For example, through a more flexible offer of restorative justice made available to victims of crime by appropriately qualified staff.
- Ensuring that young people at more risk of offending/being a victim of crime have seamless opportunities to access the most relevant support from the widest range of support available across statutory and voluntary sector partners.
- Working with the APBs and Health Boards to ensure a consistent and equitable CJ substance misuse service across the region.

Appendix 3: Key recommendations and responses

Recommendation 1

The Police and Crime Commissioner (PCC) is recommended to take a leading role within each local authority area Public Service Board (PSB) representing the needs and interests of victims of crime. This includes leading efforts to:

- a. Embed in all key strategic planning and commissioning processes with partners, a recognition of victims of crime and vulnerable persons as a distinct cohort of people with specific needs and requirements.
- b. Embed in mainstream service delivery delivered by partners, specific actions to support the prevention and detection of cyber-crime and fraud (e.g. equipping care navigators and fire safety officers with the tools to support older people that are disproportionately affected by fraud).
- c. Ensure the needs of all those affected by Violence Against Women, Domestic Abuse and Sexual Violence (VAWDASV) are adequately met by key statutory partners, most particularly health boards and local authorities. This includes particularly:
 - Addressing the gap in therapeutic interventions for victims of domestic abuse and sexual violence as a priority. It is unacceptable that children and young people and many adults, for example, are waiting more than a year for access to therapeutic support.
 - Promoting best practice models such as integrated approaches to Independent Domestic Violence Advisory (IDVA) services and supported housing provision.

Response

The PCC already has representation on each Public Service Board. PSBs are currently reviewing their role, effectiveness and interfaces with other partnerships. This provides a key opportunity for the PCC to engage and influence future workstreams. Projects such as SWAIL, Making Every Contact Count and Community Connectors already exist and we can seek to embed specialist fraud and cyber prevention training within future plans.

Action: PCC to continue engagement with PSBs.

Action: Provision of fraud training to be discussed with Dyfed Powys Police at Policing Board 3rd September (vulnerability focus).

The PCC already has representation on the Mid and West Wales VAWDASV Strategic Board, attended by the Director of Commissioning. The PCC was instrumental in bringing partners together to achieve the first jointly commissioned IDVA service across Dyfed Powys, commencing in July 2018. Through the work of the Strategic Board, further development of commissioning approaches and models are being explored. The Director of Commissioning (DoC) recently contributed to the work to map the VAWDASV commissioning landscape, along with the workshop to review and refocus the work of the Board. The DoC also sits on the Regional Collaborative Committee where opportunities for joint commissioning or alignment with Supporting People contracts are explored.

The PCC has raised concerns at Ministerial level and with Chief Executives of partner agencies regarding the lack of service provision for ongoing therapeutic counselling. This is a message that the PCC will continue to prioritise.

UPDATE 2020:

PCC engagement with PSBs continues and the PCC presented to the Regional PSB meeting in November 2020 outlining key achievements to date and priorities for the future, including how best the agendas could align. The PCC's ask of partners around the PSB table was to support his work on victims and young people.

Both Goleudy and Dyfed Powys Police have linked in with Community Connectors to ensure they are aware of the latest advice and support available to vulnerable residents.

PCC's engagement team are linked in to Pembrokeshire PSB action plan regarding community engagement.

Recommendation 2

The PCC is recommended to use its own commissioning processes to:

- a. Focus specialist victim support commissioning on VAWDASV, exploitation of, and harm perpetrated against children and young people and victims of cyber-crime.
- b. Drive interagency collaboration where statutory and VCS services work together to offer integrated wraparound support to victims of crime and vulnerable persons, and so address needs related to:
 - Mental and physical health
 - Shelter and accommodation
 - Family, friends and children
 - Education, skills and employment
 - Drugs and alcohol
 - Finance and benefits
 - Outlook and attitudes
 - Social interactions
- c. Promote evidence based approaches which demonstrate impact on victim satisfaction and/or crime reduction, at the same time as offering scope to test new approaches grounded in knowledge about what works.

Response

Existing commissioned services include a focus on these areas. Consideration has been given previously to the support required by victims of cybercrime and fraud; at the time no gaps were identified but there is scope to revisit this. Goleudy currently provide a service to all victims of crime, including those reporting to Action Fraud. Consideration should be given to the wider needs of young victims currently in contact with Goleudy. The current contract with Llamau for the provision of support and mediation to missing young people ceases on 31st March 2020.

Action: Discussion with Dyfed Powys Police regarding potential gaps in prevention or support services for victims of cyber/fraud. To be discussed at Policing Board 3rd September (vulnerability focus).

Action: Re-tendering of the missing young people contract to be finalised with new service to commence on 1st April 2020.

Action: Goleudy to provide data/business case regarding volume and need of young victims

Current service providers are expected to work together with all partners both statutory and voluntary to ensure service delivery of the highest quality. Tender processes always encourage consortium bids. Grant opportunities provide flexibility for smaller scale providers to access funding; this enables delivery that complements existing services, fills identified gaps in provision or tests new approaches. All organisations receiving grant or core funding are required to provide outcomes to measure the impact of their work.

UPDATE 2020:

PCC has funded a number of posts within the fraud and economic crime team in Dyfed Powys Police. This is reviewed on an annual basis. It is recommended that the Force's business benefits function provides some evaluation of investment into this area.

Goleudy are working closely with the fraud and economic crime team to provide a service to victims of fraud. This offer of service is over and above the national level provided by Action Fraud.

The PCC is currently working with Barnardos to undertake a deep dive analysis of the profile and needs of young victims of crime. This will be finalised in early 2021 with a view to developing a service model for implementation in Term 3.

The Missing young people's debrief service was successfully retendered and was awarded to Llamau to continue the service from April 2020. This provides a consistency of service within the Dyfed Powys area.

Recommendation 3

Supporting recommendation 1b and addressing a gap in meeting the needs of victims of crime, the PCC is recommended to commission support that increases knowledge, skills and confidence to support victims of fraud and raises awareness of how to prevent fraud. This is recommended to include specific actions that ensure:

- a. Support accommodates the rapid developments and changes in how fraud is committed, including fraud which is perpetrated digitally. This includes linking with relevant officers within Dyfed-Powys Police cyber-crime and fraud teams.

- b. The specific needs of older people who are more likely to be victims of fraud and less likely to report fraud are a key focus of the support.

Response

The PCC has funded 2 posts within Dyfed Powys Police Fraud Investigation team to support Operation Signature and the Banking Protocol. These posts are funded from the Proceeds of Crime Act (POCA) fund. This includes a Fraud Safeguarding Officer who is responsible for education internally and externally and engaging with partner agencies and charities. The officer is responsible for working with Goleudy to ensure appropriate processes are in place for victims.

Action: Update to be requested from Dyfed Powys Police on the achievements and outcomes of this team, in particular what prevention and awareness raising work is undertaken with vulnerable victims. To include update from Goleudy regarding the interface with the Fraud Safeguarding Officer and how this enhances the support being provided to victims. To be discussed at Policing Board 3rd September (vulnerability focus).

UPDATE 2020:

Presentations have been received at Policing Board regarding the progress of the fraud and economic crime team and their partnership work with Goleudy. As referenced earlier, the PCC has committed further investment into this team which is reviewed on an annual basis.

Recommendation 4

The PCC is recommended to improve planning and delivery of victim support through:

- a. Requiring that Goleudy's performance management approaches are addressed as a matter of urgency.
 - Requiring Dyfed-Powys Police to implement changes to IT workflows (as part of police officer hand-held devices ideally) which enable direct referral, except where the victim has opted out, of all cases:
 - Involving sexual violence to New Pathways.
 - Involving domestic abuse assessed as high risk to Hafan Cymru/Pobl.
 - Except those above to Goleudy (noting requirements relevant to hate crime, homicide, human trafficking etc.

- which are addressed by nationally commissioned victim support services).
- b. A continuous improvement event that brings together New Pathways, Hafan Cymru/Pobl and Goleudy and other specialist services to agree one protocol grounded in a victim-led response for those times where a victim might be supported by first-line and specialist victim support services.
 - c. Developing a more integrated and flexible model of restorative justice which involves co-location of the specialised restorative justice service at Goleudy; and where that service is responsible for gathering information and offering restorative justice to victims of crime, where relevant.

Response

The provision of performance information and the required IT workflows have been an ongoing priority since the inception of Goleudy in 2017. The IT workflows relating to other victims require an operational decision regarding victim pathways. A number of continuous improvement events have taken place, but Dyfed Powys Police have yet to identify a definitive victim pathway. A domestic abuse event was undertaken in January 2019 and the current domestic abuse review project includes an intention to map the offender journey and alongside it the victim pathway.

Closer working arrangements between the Restorative Justice service and Goleudy have been encouraged for some time now, with recent discussions concluding that co-location is not currently feasible. The OPCC has previously assisted with legal and information sharing processes to ensure appropriate access to victim information. However, there remains a barrier to commissioned services being provided with the required access to information.

Action: Victim pathway outline to be discussed at Policing Board 3rd September (vulnerability focus). To include outcomes from domestic abuse event, sexual offences event (due 10th July) and domestic abuse review work.

Action: Legal issues regarding obtaining of consent from victims to be discussed at Policing Board 4th July (victim focus).

UPDATE 2020:

A review of Goleudy victim and witness services was undertaken in November 2019 and recommendations and actions from this are outlined later in this strategy. A deep dive of victim withdrawal was also undertaken by the OPCC in December 2019 resulting in a number of recommendations made to the Chief Constable.

In response to the above reviews, the Chief established a Victim Implementation Review Project which has delivered against a number of action areas. This included a process review of the victims' experience with key areas for improvement identified. This action plan is owned by the Victim and Witness Board, which now aligns the internal DPP group with wider LCJB partner membership.

The Force have also established an end to end crime project which will address some of the key concerns raised in the above reviews. Progress of this is reported to Policing Board.

The OPCC is working closely with the VAWDASV Strategic Board to align commissioning opportunities. An evaluation of the vulnerability desk within DPP and the associated daily discussions is taking place in November 2020. This will inform the future direction of travel for the commissioning of domestic abuse support services. A commissioning sub group is in place with responsibility for future planning and commissioning of services.

The OPCC is undertaking a Data Protection Impact Assessment in order to develop an information sharing protocol for use between Dyfed Powys Police and the Community Rehabilitation Company. This is based in legislation and includes the statutory duties within the Victims Code of Practice (soon to be refreshed as victims' rights). This will allow cases where there is an identified offender and an outcome at court to be shared directly with the CRC to enable the offer of RJ to the victims.

Recommendation 5

The PCC is recommended to take a leading role within VAWDASV and the Criminal Justice Board to:

- a. Facilitate an 'end to end' system review of the CJ process particularly, with links to the wider support system for those affected by VAWDASV e.g. therapeutic interventions and housing.

- b. Prioritise availability of therapeutic interventions for victims of domestic abuse and sexual violence as per recommendation 1c.
- c. Ensure all Criminal Justice services and those commissioned by the PCC contribute to the work of the VAWDASV Strategic Group on mapping and improving consistency in data recording.

Response

The PCC currently chairs the Local Criminal Justice Board (LCJB) and is represented on the regional VAWDASV Strategic Board. The VAWDASV Board are currently mapping the commissioning landscape and related offender/victim pathways. See recommendation 4 regarding victim pathways and recommendation 1c regarding provision of therapeutic interventions.

Action: Presentation from regional VAWDASV lead to be provided at October LCJB meeting for members' consideration and to identify any required actions.

UPDATE 2020:

See response to recommendation 4 regarding commissioning of VAWDASV services. The PCC has also been instrumental in taking forward conversations at Ministerial level in order to achieve progress with the Regional SARC project. As a result of this, the Board now has a governance structure in place to enable the joint commissioning of acute SARC services between Health and Police partners. Phase 2 of this work will include community based services and ongoing conversations need to be had with government funders and partners to ensure that the level of service meets the evidenced demand. The PCC will continue to lobby for this.

Recommendation 6

In implementing recommendation 2, as it concerns children and young people, the PCC is recommended to:

- a. Facilitate with partners, integrated pathways with statutory and voluntary sector partners within each local authority area to prevent and mitigate the impacts of county line harms, other forms of exploitation of children and young people and those at greater risk, such as those who have been victims of domestic abuse and sexual violence, in the care system, missing at least five times and/or those who have experienced multiple adverse childhood experiences

- (ACEs). This includes ensuring that there is a clear and well understood step down process to sustain good outcomes for these children and young people once more specialist inputs are complete.
- b. Encourage further development of the evidence base about the impact of preventative work with children and young people with multiple ACEs in reducing crime and improving life chances for these children and young people.

Response

The PCC will be working with the Hywel Dda Area Planning Board to host a cross partnership/cross agenda Prevention Summit in late Autumn 2019. This will bring together prevention work including resilience building, ACES, trauma informed approaches, county lines and safeguarding. The PCC will also be considering what joint commissioning opportunities exist with Area Planning Boards in particular around the prevention agenda for young people. Recommissioning exercises within 2019/20 may allow the opportunity for reconfiguration of existing approaches and funding models. See recommendation 2 regarding the continuation of the contract to support missing young people and exploration of support for wider needs of young victims.

The PCC commissions the four Youth Offending Teams across the Force area to provide prevention services for those at risk of offending. This includes academic support to establish an evidence base and measurable outcomes.

UPDATE 2020:

The OPCC continues to work with APB partners in regard to prevention. In Dyfed in particular, a new prevention coordinator post is mapping the existing provision across the area. This is linked to a review by the Dyfed Powys SVOC coordinator of early intervention and prevention work within the Force area. Both these reviews will inform future planning and commissioning of services.

As part of the 3 year grant funding provided by the PCC to Youth Offending teams in the Force area, there is a piece of work being undertaken with Aberystwyth University to measure the success of the prevention work carried out with young people at risk of offending. This will link to the Youth

Justice Board's Prevention Pathfinder and will inform future investment. The OPCC is also representing Welsh PCCs on a task and finish group with the APCC and Youth Justice Board to establish best practice in relation to governance and funding relationships between PCCS and Youth Offending Teams across England and Wales.

The PCC is currently exploring a number of co-commissioning opportunities with the National Probation Service following the Strengthening Probation programme of work to re-establish offender management under statutory delivery. This includes early intervention and prevention opportunities.

Recommendation 7

In implementing recommendation 2, as it concerns criminal justice substance and alcohol misuse, the PCC is recommended to work with Area Planning Boards (APBs) and health boards to develop a single Dyfed-Powys approach. Key considerations include:

- a. Ensuring greater equity and consistency in delivery across the region.
- b. Maintaining best practice approaches such as the prison link workers and integration wherever possible into generic substance and alcohol misuse services.
- c. Gaining the benefits of scale to achieve greater value for money.

Response

The PCC already seeks to promote opportunities where Force-wide delivery can be achieved. This has been raised with both Dyfed and Powys Area Planning Boards in the past but contracts have yet to be aligned to allow for joint commissioning of services. The Director of Commissioning has been working with Her Majesty's Prison and Probation Services (HMPPS) to review current arrangements and a proposal regarding the current recommissioning of Dyfed treatment services has been agreed in order to align with other contract end dates across Wales. This would allow for Wales wide discussions to be progressed within the next two years.

Action: PCC to ensure continued representation on both APBs, to support all opportunities for joint working arrangements and to review current investment levels.

UPDATE 2020:

The PCC has been influential in informing recent recommissioning in Dyfed to reshape the specification, align it to the Future Generations Act and achieve innovative and transformative approaches to addressing challenges including:

- Recognition of the impact of Adverse Childhood Experiences, how to identify and address this amongst the treatment cohort
- Awareness of the various routes of exploitation such as county lines and other risk factors for those vulnerable within communities
- Consideration of the family around the individual, ensuring provision of wider support and identification and management of safeguarding issues/risks
- Promoting positive community benefits and ensuring wellbeing of communities aligned to the Well-being of Future Generations (Wales) Act 2015
- Service users with co-occurring substance misuse and mental health issues

This work still has some way to go and the PCC has currently only committed funding for an initial contract period of 2 years. Within this time there is a requirement for ongoing evaluation of the service to inform future developments regarding prevention services in particular, along with detailed performance and outcome data. The evaluation and associated work of the APB will also need to demonstrate that the value of the contract is appropriate and is evidence based, with an associated funding formula/rationale for the total value and the apportionment between partners. This should include consideration of the outcomes delivered both by this contract and by other projects and services commissioned by the APB and how these contribute towards core APB and partner priorities.


Powys APB will imminently be starting the same recommissioning process and Dyfed Powys OPCC intend to align the criminal justice elements of the plan as far as possible with Dyfed to ensure consistency of provision across the Force area.

Both these specifications include the provision of services that will be mirrored across Wales and therefore this offers up the opportunity for considerable restructure and closer alignment of the commissioning arrangements across Area Planning Boards, in particular for the criminal

justice partners. This will also form part of the discussions with NPS regarding potential co-commissioning opportunities.

Appendix 4: Independent Review of Victim Services

In November 2019 an independent review was undertaken of the Goleudy Victim and Witness Service in Dyfed Powys. Below are the key recommendations, with a response provided by Dyfed Powys Police and further comments added from the PCC’s perspective. The table also identifies the ongoing actions and governance required to carry the recommendations forward:

Recommendation	Response	Ongoing governance / updates required
<p>1 Current leadership and governance arrangements should be strengthened through the appointment of a senior level lead for victims within the force</p>	<p>Recommendation supported and adopted. See new TOR for CJ and Investigations with Superintendent appointed as Victims and Witnesses lead.</p>  <p>CJ and Investigations TOR v</p>	<p>None</p>
<p>2 The process for the initial assessment of a victim’s needs should be a core aspect of the initial crime recording process undertaken by frontline officers and staff.</p>	<p>Recommendation supported and adopted. At present officers attending a scene to speak directly with a victim will complete an initial needs assessment and ask a set of questions in respect of Goleudy support.</p> <p>These questions have been designed with a presumption that support will be offered.</p> <p>Recent changes have been made so that where an officer deems that support is not required they would record the reason why.</p>	<p>None</p>

	<p>A fix has been adopted to both the Crime Management System and Mobile Data Terminals (details of which are currently featuring on the Force Bulletins).</p>	
<p>3 The roles and responsibilities of the existing Victim Care and Victim Support Officers should be aligned into a single role of Victim Care Coordinator</p>	<p>Recommendation not supported.</p> <p>There are currently 3 roles within Goleudy: Victim Care Officers (VCO's) – Grade C (4 full time posts) Witness Care Officers (WCO's) – Grade C (3.5 full time posts) Victim Support Officers (VSO's) – Grade D (6.15 full time posts)</p> <p>The VCO's are HQ based and will carry out a triage function. This takes the format of a RAG system where individual needs are assessed and prioritised.</p> <p>The VSO's are based around the Force area and provide more in depth care and support. Their geographical spread also allows them to be able to carry out personal visits.</p> <p>Due to the COVID restrictions, home visits have not been possible and other contact methods (Skype, Zoom etc) have been utilised where suitable and possible. This also allows for more potential contacts to be made as there</p>	<p>Contact methodology to remain under review, to be discussed in quarterly contract management meetings</p>



	<p>is no requirement for travelling. However not all victims will have access to the required software and equipment and it is important that victims have a choice of support options.</p> <p>The Witness Care Officers will make contact with all victims and witnesses after the first court hearing (where required) and will then provide advice and support through this aspect of the journey.</p> <p>To amalgamate these roles would require the VSO's to assist with undertaking of the triage duties remotely and the VCO's to then be trained in the VSO role. This would also require an implementation of a higher grade for the 4 full time VCO posts.</p> <p>The structure compares well to a similar hub model used in Avon and Somerset.</p> <p>Note: additional discussions at Policing Board focussed on the need for the contact methodology to be reviewed, which is now complete.</p>	
<p>4 The identification, development and delivery of restorative justice should be the responsibility of Goleudy staff</p>	<p>Recommendation not supported. At present Goleudy do not have the capacity or expertise to undertake the identification, development and delivery of Restorative Justice.</p>	<p>To be taken forward as a priority under the working group for joint commissioning between PCCs and National Probation Service</p>

	<p>There are currently only 35 cases of RJ per year in Dyfed-Powys and this may partially be due to knowledge and understanding of the benefits. This is where Goleudy will have a role to play as they are in a position where they can engage and advise victims on the potential benefits and do so at a suitable period of the investigation process.</p> <p>This aspect is acknowledged by the Goleudy management who have prepared training in the subject for the team however, as with other elements of the training programme, it has been delayed by Covid.</p> <p>OPCC note: additional discussions at Policing Board centred around the joint commissioning opportunities with National Probation Service (NPS) going forward. RJ is a priority for the OPCC in the discussions with NPS and there is potential for an All Wales solution tailored to local areas. This is a priority for early 2021.</p> <p>There is a requirement for RJ to be delivered by an accredited provider which is a lengthy and costly process that would also need to be taken into consideration.</p>	
<p>5.The recruitment, development and supervision of Goleudy volunteers should be the</p>	<p>Partly agreed. The Force has a volunteer coordinator who can assist with the recruitment of volunteers. There</p>	<p>Use of volunteers will form part of annual audit of commissioned services.</p>

<p>responsibility of a nominated supervisory role within the Goleudy team</p>	<p>is however, a need to establish what role potential volunteers could perform. The manager has stated that there may be opportunities for roles at events such as open days where the role of Goleudy could be showcased.</p> <p>Another option would be to develop links with already established befriending services which could be utilised to provide longer term support after the Goleudy service has concluded working with victims. Opportunities will be sought to explore the utilisation of volunteer services that already exist. Going forward, these opportunities will be further discussed in the new Victims and Witnesses subgroup.</p> <p>Note: This was welcomed in discussions as positive progress and would assist with the onwards care of victims, allowing Goleudy to step away after the crisis care has been delivered.</p>	<p>Goleudy manager to liaise with Force volunteer coordinator to ensure Goleudy is included within wider Force recruitment and planning.</p>
<p>6 The roles and responsibilities of any service volunteers should be reviewed to ensure they reflect the needs and priorities of the new service model and the skills and experience of prospective volunteers</p>	<p>As mentioned above, consideration is to be made using volunteers who are not exclusive to Goleudy.</p>	<p>As above</p>

<p>7 The Case Hub Tracker (CHT) system should be replaced with a solution designed to meet the needs of a contemporary victim support service</p>	<p>Partly agreed. Improvements have been made to the system by IT recently but there are concerns about the implementation of NICHE. At present the referrals come into the CHT via the current Crime Management System and from the ASB system, MAVIS.</p> <p>Further work is required to ascertain what new system would be suitable to operate alongside NICHE, what benefits this system would have over the current CHT and how much would it cost.</p> <p>The ICT Product and Programme Manager is aware of the requirements and will be working with NICHE and Goleudy to ensure that their needs are met and any integration with NICHE is considered and progressed at the appropriate time.</p> <p>The manager has also stated that the team will discuss with NICHE regarding the possibility of them developing a suitable module to provide the functionality required however this has not been confirmed or finalised.</p>	<p>Ongoing discussions via Records Management System project.</p> <p>To sit under Victim and Witness sub group performance management standing agenda item</p>
<p>8 The service should prioritise the development of strong multi-agency partnerships, co-located where possible to enable better</p>	<p>Agreed and implemented. Evidence is available of collaboration between Goleudy and other agencies (both statutory and non-statutory) which has been undertaken</p>	<p>None</p>


coordination of support, minimise duplication and provide a more seamless journey for victims and survivors

since the service was implemented. Examples include:-

- A working partnership with the IDVA and ISVA service exists with scheduled monthly meetings to discuss any issues and identify any areas that can be improved upon.
- Calan DVS and Threshold also have a good working relationship with all operational staff and this has been demonstrated through daily discussions (MARAC).
- A positive relationship exists between CAWS and Goleudy both strategically and operationally. There is a hot desk arrangement at HQ for CAWS which provides benefits for both and is evidence of some co-location. Further co-location opportunities are likely to be subject of wider working considerations post Covid.
- Dewis/Choice – regular liaison since they were established in 2017 when a WASPI was created for data sharing with their IDVA attending team meetings and visiting the hub.

Contacts have also been established with a wide number of in house victim & witness managers as well as with neighbouring forces.

	<p>All are aimed at sharing best practice and seeking advice.</p> <p>Victim Support continue to hold the Hate Crime contract, therefore close contact has been maintained between both providers. A hot desk continues to be retained within the hub for operational VS staff members.</p>	
<p>9 As part of the implementation of a revised model the force and OPCC should develop a performance framework focused on two key elements. The mandatory MOJ outcomes and performance measures and outcomes that are co-produced with victims of crime.</p>	<p>Recommendation supported.</p> <p>Clarity needed on performance data – what needs to be recorded, produced and how to extract. Note: It was confirmed that this clarity is in relation to the performance data extracted by the Force Intelligence Bureau (FIB) and associated arrangements. There was commitment from Chief Officers that the support provided by FIB should be recognised on a more formal basis and scheduled into workloads with contingency plans in place to ensure the data is always available.</p> <p>The performance needs to be measured against the 4 MOJ Key cope and recover outcome measures:</p> <ul style="list-style-type: none"> a) Wellbeing – Improved health and wellbeing b) Coping – Better able to cope with aspects of everyday life c) Safety – Increased feeling of safety 	<p>To sit under Victim and Witness sub group performance management standing agenda item.</p>

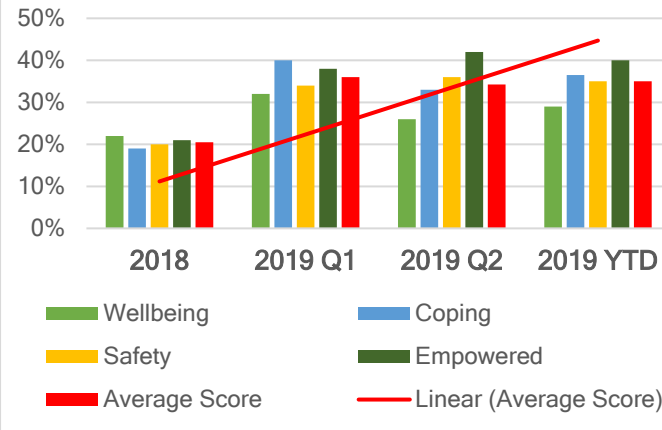
	<p>d) Empowered – Better informed and empowered to act.</p> <p>The exit question surveys need to reflect these key measures. This will ensure that victims are aware of the aims that Goleudy are seeking to achieve with them from the outset and there is no confusion or concerns in respect of managing expectations.</p> <p>The previous exit questionnaire did not fully align with the outcome measures and, after consultation with the Goleudy manager, the questionnaire has been re-designed.</p>  <p>New Goleudy Exit Questionnaire.doc</p>	
<p>10 The service should review its Service User Satisfaction and the force Satisfaction Survey questions asked to ensure they can elicit, from victims, qualitative feedback that can inform service improvement</p>	<p>Recommendation supported and implemented. As per point 9 above. The new exit questions allow for qualitative feedback from victims. The feedback from these responses will form part of the MOJ return to the OPCC and relevant feedback will be subject of discussion and action for both the Force and LCJB Victim and Witness subgroups.</p>	<p>To sit under Victim and Witness sub group.</p>

The review also provided some areas for improvement for the Goleudy service, again outlined below with responses:

Area for Improvement	Response	Ongoing governance / updates required
<p>1. The force should prioritise the recruitment and maintenance of the contractually agreed staffing level</p>	<p>Recommendation supported and implemented.</p> <p>Current abstractions at the time of writing were all due to be filled imminently. However, this is a moving picture and the team experience high rates of turnover.</p> <p>The OPCC and ACC have recently agreed to an additional VCO and WCO post which will both be temporary for 1 year. Interviews are currently ongoing for these vacancies.</p> <p>The above is all positive for the department however, the new members will require an initial training and adaption period for the complexities of their new roles.</p> <p>Note: discussions included how a revised contact methodology would assist with resource pressures. A longer term discussion may be required for proposed ways to mitigate the high turnover rates.</p>	<p>Ongoing as part of contract management meetings.</p> <p>A longer term discussion may be required for proposed ways to mitigate the high turnover rates.</p>
<p>2. Goleudy should put in place a plan to understand and improve the outcomes for victims (A significant proportion of victims are reporting a deterioration rather than improvement</p>	<p>Recommendation agreed but this area for improvement may be due to a data flaw. This concern has been discussed with the service manager as the information on the graph at Chart 2 highlights a worrying trend.</p>	<p>Victim and Witness sub group under performance management standing item</p>

against the MOJ four key cope and recover outcomes measures)

Chart 2 - Percentage of victims reporting a deterioration when measured against MOJ cope and recover outcomes



The data indicates that there is an increase in the number of victims reporting a deterioration in the MOJ cope and recover outcomes **after** they have received Goleudy support. i.e. they feel worse after Goleudy intervention than when they were initially a victim.

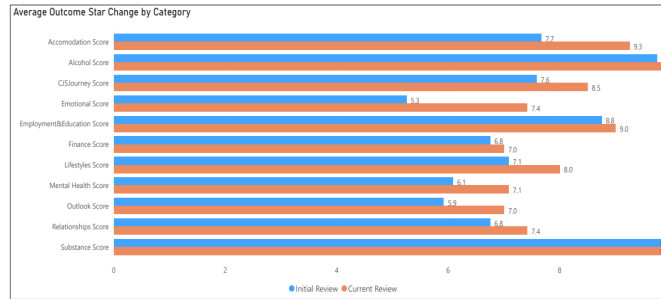
Clearly this is a significant concern and discussions have taken place between the Goleudy manager and crime analyst with regard to the data interpretation.

Below is the most recent performance data return, the format of which has been changed

by the data analyst to show the perceived changes that victims feel since their initial assessment and then during their exit interview.

16. Distance travelled by victims from initial assessment to exit

Of the Outcome Stars undertaken on completion during this quarter – please see below the mapped out average 'distance travelled' for each category.



The Outcome Star scoring system that is used with our victims is a 10 – 1 sliding scale.

1 indicating = Poor/Negative/Complex entrenched issues.

10 indicating = Excellent/Positive/No issues



Goleudy
Performance Data -

The above chart gives a clear indication that, at the exit interview (orange), the victim has seen improvements against the MOJ outcomes **after** they have received support compared to prior, and shortly after they became a victim. This is what should be expected and would not likely have been raised by the review author if initially seen in this format.

Continued scrutiny and review is encouraged to ensure that the most recent data is consistent. This will be subject of a standing agenda item

	<p>for the new Victims and Witness subgroup where the 'Outcome star' data will continue to be examined.</p>	
<p>3 The service should develop and maintain a staff Training Needs Analysis. Investment in staff training and development should focus on the core skills and capabilities of the team rather than bespoke or specialist service provision</p>	<p>Agreed and implemented. There is a comprehensive plan for staff training. This training features a mix of in house delivery from specialist departments such as the Economic Crime Team as well as external providers for (as suggested in the review) Trauma Informed Practice.</p> <p>The requirement here is for a more formalised recording process which should be completed during the Development and Assessment Profile (DAP) process. This has been adopted at the latest DAP process and ensures that the line manager can discuss the individual needs highlighted by staff alongside the training schedule prepared.</p>	<p>Training plans to be considered in commissioned services audit plans</p>
<p>4 Goleudy should seek out and secure collaborative development opportunities with local and regional partners and generic training and development such as Trauma Informed Practice should be explored</p>	<p>Recommendation supported. Trauma Informed Practice training has been arranged.</p> <p>The budget for staff training is carefully managed as external providers are expensive hence the recommendation to explore opportunities for shared training with other service providers such as New Pathways.</p>	<p>Training plans to be considered in commissioned services audit plans</p>

	<p>As stated previously a comprehensive training schedule has been developed for the team members but has been temporarily cancelled due to Covid. The suggestion for collaborative development is agreed in principle for when resumption of more normalised circumstances allow.</p>	
<p>5 Goleudy should review the roles and responsibilities of the current cohort of volunteers to ensure that their use and deployment is in line with force policy and national guidance. A risk identified was that the volunteers are reportedly undertaking the same role and function of a paid staff which may be inappropriate</p>	<p>Partially agreed. The review author correctly points out that it is not suitable for volunteers to undertake the VSO role. This is a salaried role and it would be inappropriate to train volunteers to carry out the same tasks as a paid employee.</p> <p>There has been some criticism, by the author, of some volunteers performing this function. The Goleudy management have committed that any future volunteers will not be trained to perform these same functions and there have been no issues raised by any staff associations regarding those currently serving.</p>	<p>Use of volunteers will form part of annual audit of commissioned services.</p> <p>Goleudy manager to liaise with Force volunteer coordinator to ensure Goleudy is included within wider Force recruitment and planning.</p>
<p>6 The Service should capitalise on strength of its unique position to and develop and implement an internal and external marketing/communication campaign to raise awareness of the Service and the 'Goleudy offer'</p>	<p>Recommendation supported. The review acknowledges that there is an awareness of the Goleudy services by front line officers. (58% of respondents to their survey relating to Goleudy support stated they were given information)</p>	<p>Publicity and marketing to be a continuous focus for Force and OPCC communications teams</p>

	<p>More needs to be done to improve officer’s awareness and understanding of what Goleudy can do both for victims and for themselves. Aside from a podcast relating to the ASB services Goleudy offer, there is little information on the Force website.</p> <p>The new information packs contain 2 pages of specific information about Goleudy and will be on hand for officers when in direct face to face contact with victims. Although primarily created for the victims themselves the content has also been prepared to assist officers in their knowledge of what services are on offer. A communications strategy is being developed to inform officers of the packs, when they should be used and what information is contained within.</p>	
<p>7 The Goleudy leadership should actively nurture and develop stronger relationships with local victim service providers</p>	<p>Agreed but already established. See Point 8 in the Recommendations.</p> <p>Ongoing opportunities to further develop links with other service providers including the victim support services of adjoining forces, for training opportunities and sharing of best practice.</p>	<p>None</p>
<p>8 Goleudy and the Force Data Protection Officer should review the current data protection, consent, Opt-In/Opt Out and</p>	<p>Agreed and implemented. This work has been carried out via the Goleudy manager and the force DPO. It is clear that there is no requirement for victims to provide consent</p>	<p>None</p>

<p>information sharing arrangements in the context of the ICO advice provided to victim support services to ensure that they are not presenting as a barrier to effective multi-agency partnerships and the provision of support to victims. Goleudy should also develop and publish a Privacy Policy specifically for the service</p>	<p>for their information to be shared with Goleudy as Goleudy are an in house service of the Force. What is however required is that consent must be obtained for Goleudy to share the victims details with external agencies. This practice is now in place and is in line with the advice from the ICO. There are no identified barriers that have been raised by partner agencies in respect of the data sharing protocols that are in place. The information has been cascaded to all officers via the notice displayed on the current Force Banner. http://dppi2/media/3auj51su/cms-goleudy-alert.pdf</p>	
<p>9 Goleudy should, in conjunction with the force, review the current ASB recording and risk assessment process to ensure that it is meeting its contractual obligations and victims of ASB have access to the care, cope and recovery offer from Goleudy</p>	<p>Agreed and implemented. Goleudy are contracted to deal with High and Medium ASB referrals. At present they would be unable to service the demand for Low Risk referrals as well.</p> <p>Goleudy supervisor attends the ASB steering group which is organised by the Crime and Harm Reduction Unit (CaHRU).</p> <p>The force is not currently compliant with National Crime Recording Standards (NCRS) in respect of ASB calls. It is estimated that approximately 50% of calls taken and categorised as ASB actually have substantive offences for which crimes should be recorded.</p>	<p>None</p>



To address this the FCC has designed a training package in relation to the identification of ASB vs course of conduct/POA.

It is apparent that the ASB MAVIS system was not allowing referrals to be forwarded to the Case Hub Tracker as well as NPT officers being unaware of the process. An IT fix has been implemented with a new question set added to the MAVIS system prompting officers to consider (and offer) Goleudy support more clearly. This was reinforced via information sent out to all of the NPT's.

This fix, which came into effect in August, has seen an increase in referrals from 69 in the first quarter to 147 in the second with August referrals being the highest recorded at 56. This is a positive indication that the previous IT issue has been rectified.

The ASB coordinator expects this trend to continue and has referenced the fact that ASB victims have numerous opportunities to request support as the MAVIS question set is repeated, periodically, during the investigation. The probability of an ASB victim not being able to access support is therefore unlikely.

The ASB coordinator is requesting a further IT fix via the Crime Management System to allow

	officers to identify crimes that are linked to ASB. This will ensure that problem solving opportunities are not missed by the neighbourhood teams.	
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ⁱ Office of National Statistics, Crime in England & Wales, year ending September 2018 - PFA tables, Table P3, published Feb 2019

ⁱⁱ All crime is split between two primary offence groups: victim-based crimes and other crimes against society. Victim-based crimes are those with a specific identifiable victim. So, for example, some crimes against the State such as tax fraud are not classified as victim-based crimes. In addition, victim-based crime can be separated into crimes against people and households and crimes against businesses. See: ONS, *User Guide to Crime Statistics for England and Wales*, Jan 2018 (Chapter 5).