



supporting voluntary organisations that
work with offenders and their families

**London Voluntary Service Council and Clinks response to the Mayor's Office
for Policing and Crime (MOPAC) Police and Crime Plan consultation**

Introduction to London Voluntary Sector Council

London Voluntary Sector Council (LVSC) is the collaborative leader of London's voluntary, community and social enterprise (VCSE) sector. Since its founding in 1910, LVSC has championed the VCSE sector and enabled a co-ordinated voice to influence policy makers. We support London's 120,000 voluntary and community organisations which provide a range of services and support to London's diverse communities and empower the lives of Londoners.

The VCSE sector in London ranges from large multinationals like Oxfam to entirely volunteer-run play schemes - in fact it is estimated that 80% of this activity is carried out by volunteers in non-registered organisations, working at the grassroots in the heart of their communities. It employs over 250,000 people and contributes some £19 billion to London's economy.

Our vision is of communities being at the centre of a fair and prosperous London.

Our mission is to champion and partner London's communities through building the capability, sustainability and impact of the VCSE sector.

We do this through Building, Connecting and Leading:

- Building the capacity of London's VCSE sector to deliver enhanced social value
- Connecting the VCSE sector by growing the information ecology
- Leading, sharing and influencing through a distinctive and definitive voice.

Introduction to Clinks

Clinks is the national infrastructure organisation supporting voluntary sector organisations working in the criminal justice system. Our aim is to ensure the sector and those with whom it works are informed and engaged in order to transform the lives of offenders and their communities. We do this by providing specialist information and support, with a particular focus on smaller voluntary sector organisations, to inform them about changes in policy and commissioning, to help them build effective partnerships and provide innovative services that respond directly to the needs of their users.

The Safer Future Communities network

The Safer Future Communities (SFC) network has over 500 member-organisations and affiliates. The network now has four functioning subgroups: Victims' Services Alliance, London Gangs and Serious Youth Violence Network, Violence against Women and Girls (VAWG) Expert Reference Group and the Reducing Reoffending VCS group. The SFC network serves as a key avenue of communication between Mayor's Office for Policing and Crime (MOPAC) and the VCSE sector. MOPAC are the main funders for the project.

The SFC network sits on the Mayor's Reducing Reoffending Board, the Youth Justice Reducing Reoffending Board and the Female Offender Strategy Board, as well as the VAWG Strategy Board.

Consultation process

LVSC consulted with a range of voluntary organisations in order to inform this response. Four consultation events took place, bringing together members of the VAWG Expert Reference Group, the London Gangs and Serious Youth Violence Network, the Victims' Services Alliance and the Reducing Reoffending VCS Group. Sixty three organisations attended the events in total.

Evidence from Clinks' research and consultation in relation to the Taylor Review of youth justice and the Lammy Review of black, Asian and minority ethnic representation in the criminal justice system has also informed the response.

Response to the Police and Crime Plan

Summary of our recommendations:

1. MOPAC and the Metropolitan Police Service (MPS) should seek to engage with voluntary organisations as early as possible in developing localised strategies to ensure that they are able to benefit from the expertise of these organisations as well as their strong connections to local communities. MOPAC should seek to embed community engagement and accountability structures across the city in order to build trust and confidence in the MPS.
2. MOPAC's recognition of the complex needs and vulnerabilities of children and adults who offend should inform the MPS's approach to safeguarding, ensuring that vulnerable children and adults who offend are diverted out of the criminal justice system (CJS) and to the appropriate services at every opportunity.
3. Compulsory equality and diversity training for MPS officers should be developed in consultation with voluntary organisations, as well as people with experience of the CJS — including children. Similarly, clear targets for workforce diversity should be set and monitored to encourage the recruitment of a workforce that reflects the breadth of diversity in London. These targets should be set at each level of the MPS, including senior leadership
4. Building positive communication and consultation with refugee and migrant communities should be a key priority for the MPS in achieving the plan's commitment to improving public confidence and victim satisfaction in the police. The SFC network is a useful avenue to engage with these organisations and could support effective communication between the MPS and refugee and migrant communities.
5. MOPAC and CJS agencies should explore how restorative practices could be used at all levels of the CJS in order to address low level offending and provide an effective alternative to escalation through the CJS for individuals who would benefit.
6. MOPAC, in partnership with the MPS, should conduct a data analysis exercise in order to build a detailed London-wide picture of where and how black, Asian and minority ethnic (BAME) disproportionality is occurring at the point of arrest. We also recommend that MOPAC develop and publish a strategic plan for tackling inequalities for BAME people with the CJS in London within six months of the publication of final report of the Lammy Review of black, Asian and minority ethnic representation in the criminal justice system. This plan should be informed by the findings of the Lammy Review and the Young Review of outcomes for young black and Muslim men in the CJS.
7. The plan's proposed review of the Gangs Matrix should include a thorough exploration of how the Gangs Matrix may be driving BAME disproportionality and inequality in the CJS.
8. MOPAC, MPS and other CJS agencies should further develop their engagement with BAME voluntary organisations in order to understand and address the issues facing BAME communities.
9. MOPAC should seek to develop its engagement with groups working with disabled people in order to understand their specific needs and vulnerabilities in relation to crime and the CJS.
10. When taking new roles and responsibilities arising from a process of devolution, MOPAC and CJS agencies should seek to engage the voluntary sector at the earliest opportunity in commissioning processes and the design of services. This will allow government and commissioners to build a well-informed picture of local needs and develop a diverse market of providers able to meet these needs.
11. MOPAC should utilise the learning from the Making Every Adult Matter coalition, as well as information from the London Social Prescribing Map to provide effective multi-agency support for those with multiple and complex needs.

12. CJS agencies and local authorities should seek to engage children and young people as well as their families/guardians in developing and reviewing community safety and safeguarding strategies. MOPAC's proposed independent group of child protection experts should also include the voices of children with experience of vulnerabilities and where appropriate, their families and guardians.
13. CJS agencies in London should introduce the 18+1 ethnic monitoring system, which monitors Gypsy and Traveller people to be introduced across the youth justice system.
14. MOPAC and CJS agencies need to be more proactive in involving parents and families in strategies to tackle knife crime, particularly where parents and families have already taken the lead in addressing problems.
15. MOPAC should ensure that a trauma-informed approach to youth offending is informed by young people with experience of the CJS and in particular those from groups that are over-represented in the CJS – in particular BAME and looked-after children and young people.
16. MOPAC should consult with the SFC VAWG Expert Reference Group and the wider voluntary sector when developing their plans to address the rise in sexual violence in London.
17. MOPAC, in partnership with women's organisations, should explore the possibility of developing a whole systems approach to supporting vulnerable women across London, delivered through a network of women's centres covering each borough of the city.
18. MOPAC should consider the specific needs and barriers experienced by BAME women, including those from refugee and migrant communities when developing strategies to support victims.
19. In light of the recent rise in hate crime after the EU referendum, the importance of tackling racist ideologies and the related violence should be reflected in the Police and Crime Plan, with clear actions put in place to tackle this.
20. MOPAC, in partnership with the Deputy Mayor for Social Integration, should review its implementation of the Prevent strategy to understand its impact upon relationships between CJS agencies and Muslim communities and its role in Muslim disproportionality in the CJS.

A better police service for London

- We welcome MOPAC's decision to replace the 'MOPAC 7' targets with a localised approach to identifying needs and priorities. A focus on local priorities presents an opportunity to develop a more in-depth understanding of local needs and to work in partnership with voluntary organisations and local communities in order to provide a tailored, multi-agency response to these. MOPAC and the Metropolitan Police Service (MPS) should seek to engage with voluntary organisations as early as possible in developing localised strategies to ensure that they are able to benefit from the expertise of these organisations as well as their strong connections to local communities.
- The plan's focus on neighbourhood policing, based on a fundamental model of policing by consent, is much needed to help build trust and confidence in the police. To develop a model of policing that engenders positive engagement with London's diverse communities, the MPS will need to review its relationships with the communities it services and seek to build positive engagement with the organisations that reflect and represent these communities. This will not only encourage trust in the MPS but will allow local police forces to develop a more accurate and holistic understanding of the issues and inequalities faced in each area. This could be done through including representatives of local voluntary and community organisations on strategic groups, engaging in ongoing consultation with voluntary and community organisations and forming local accountability bodies including representatives of voluntary and community organisations to oversee the implementation of policing strategies. MOPAC's Stop and Search Community Monitoring Network and Safer Neighbourhood Boards are good examples of this kind of community engagement and MOPAC should seek to embed structures such as this across the city. A number of SFC network members have indicated that they would be keen to be active participants of the new Neighbourhood Policing models.
- We welcome the commitment to protecting vulnerable children and adults through collaboration between the MPS and statutory and voluntary sector partners. Voluntary sector partners provide vital services to vulnerable children and adults to address vulnerabilities through holistic, tailored support. We are encouraged by MOPAC's recognition of the complex needs and vulnerabilities of children and adults who offend and suggest that this recognition should inform the MPS's approach to safeguarding, ensuring that vulnerable children and adults who offend are diverted out of the CJS and to the appropriate services at every opportunity.
- The SFC Gangs and Serious Youth Violence Network in particular welcomed the proposal for MPS to work more closely with London schools to help build trust between the police and young Londoners. However, SFC network members would appreciate some clarification on what this may entail and what methods the MPS will use to effectively address the issues around young people's lack of trust and confidence in the police.
- SFC network members felt strongly that police officers needed to have a better cultural understanding of the communities they serve, as well as improved knowledge on equalities, discrimination and social exclusion. We recommend that compulsory equality and diversity training for MPS officers should be developed in consultation with VCSE organisations, as well as people with experience of the CJS — including children. Similarly, clear targets for workforce diversity should be set and monitored to encourage the recruitment of a workforce that reflects the breadth of diversity in London. These targets should be set at each level of the MPS, including senior leadership.
- Within the SFC network's refugee and migrants organisations there is a common feeling that the Police and Crime Plan does not adequately reflect the needs of refugees, asylum seekers and migrants. In particular, there is significant concern that a punitive policing approach to these groups of people has had a negative impact on confidence in the MPS, leading to under-reporting of crimes such as hate crimes. We therefore suggest that building positive communication and consultation with refugee and migrant communities should be a key priority for the MPS in achieving the plan's commitment to improving public confidence and victim satisfaction in the police. The SFC network is a useful avenue to engage with these organisations and could support effective communication between the MPS and refugee and migrant communities.

A better criminal justice service for London

- LVSC and Clinks welcome the introduction of an Independent Victims Commissioner for London to encourage positive outcomes for victims. We encourage the development of a holistic, multi-agency approach to supporting victims, which acknowledges the high proportion of those in the CJS who are also victims.
- We welcome the rolling-out of the London Restorative Justice Service and the opportunity this presents to improve victim experience. SFC members emphasised the importance of safeguarding vulnerable victims throughout the restorative justice process and were keen to access more information in relation to how the service will approach domestic abuse, sexual violence and hate crime. In addition to the rolling out of the service, we recommend that MOPAC and CJS agencies explore how restorative practices could be used at all levels of the CJS in order to address low level offending and provide an effective alternative to escalation through the CJS for individuals who would benefit. The Restorative Justice Council provides useful resources to support the use of restorative justice with a range of victims in order to address their specific needs.¹
- LVSC, Clinks and members of SFC networks have serious concerns about the high levels of disproportionality in the representation of black, Asian and minority ethnic (BAME) people and particularly BAME children in the CJS. Findings published by the Lammy Review² demonstrate that the majority of this disproportionality occurs at arrest stage, suggesting that further exploration and review of policing practices is warranted. While the publication of the Lammy Review's final report will no doubt provide vital insights into addressing BAME disproportionality in the CJS, it is important to recognise that the report will focus primarily on a national picture and is unlikely to provide detailed recommendations on policing. MOPAC, in partnership with the MPS, should conduct a separate data analysis exercise in order to build a detailed London-wide picture of where and how BAME disproportionality is occurring at the point of arrest. We also recommend that MOPAC develop and publish a strategic plan for tackling inequalities for BAME people with the CJS in London within six months of the publication of the report of Lammy Review of black, Asian and minority ethnic representation in the criminal justice system. This plan should be informed by the findings of the Lammy Review and the Young Review of outcomes for young black and Muslim men in the CJS.³
- Research published by Manchester Metropolitan University shows that, while only 23% of convictions for serious youth violence in London were of BAME people, 80% of those on the MPS gangs list were from a BAME background. Individuals do not have to have previous convictions or be deemed as high risk to be added to the gangs list. This not only demonstrates worrying disparities in the police use of the gang label, but also raises concerns about the potential for BAME people to be accelerated through the CJS more quickly, due to being on the Gangs Matrix. We recommend that the plan's proposed review of the Gangs Matrix includes a thorough exploration of how the Gangs Matrix may be driving BAME disproportionality and inequality in the CJS.
- Clinks was pleased to be invited as a member of the Young Review Independent Advisory Group to a consultation event with MOPAC on addressing BAME disproportionality in the CJS. We recommend that MOPAC, MPS and other CJS agencies further develop their engagement with BAME voluntary and community organisations in order to understand and address the issues facing BAME

¹ See: <https://www.restorativejustice.org.uk/resources>

² Ministry of Justice (2016). *Black, Asian and Minority Ethnic disproportionality in the Criminal Justice System in England and Wales*. Online: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/568680/bame-disproportionality-in-the-cjs.pdf

³ See: <http://www.youngreview.org.uk/>

communities. In doing this, MOPAC, MPS and other CJS agencies should be mindful that the great majority of BAME organisations are small, with limited funding, and should seek to develop flexible consultation methods and remunerate any expenses incurred by organisations where possible.

- Members of disability organisations felt that there was a lack of knowledge within government and CJS agencies about the impact of crime on disabled people and the needs of disabled people involved with the CJS. MOPAC should seek to develop its engagement with groups working with disabled people in order to understand their specific needs and vulnerabilities in relation to crime and the CJS.
- Organisations we consulted with were positive about the aim to push for increased devolution of CJS powers and responsibilities to MOPAC and to shift investment towards prevention and diversion. This represents a clear opportunity to work more closely with voluntary organisations already delivering prevention and diversion work across London and to further develop these effective services. As Clinks' *'More than a provider'*⁴ report demonstrates, there are also significant benefits to be gained from involving the voluntary sector in commissioning processes and the design of services. This can help statutory agencies to identify community needs, develop a diverse market of providers and monitor the quality of delivery. We recommend that MOPAC and other CJS commissioners seek to engage the voluntary sector at the earliest opportunity in commissioning processes and the design of services.
- We strongly welcome the plan's recognition of the relationship between complex needs and offending and the importance of addressing these needs to tackle the root causes of offending. The plan's detailed strategy for preventing repeat offending and victimisation through improving liaison and diversion and other triage services provides a strong basis for addressing the complex needs of those who offend. The voluntary sector has a strong record in developing and delivering innovative approaches to prevention and diversion, as well as developing effective partnerships with health and social care services as part of a multi-agency approach. We are encouraged by the plan's commitment to working with the voluntary sector to achieve some of these outcomes.
- Making Every Adult Matter (MEAM) is a coalition formed between Clinks, Homeless Link and Mind to improve policy and services for people facing multiple needs, which includes contact with the criminal justice system, homelessness and poor mental health. There are 13 areas across the country that have adopted the MEAM Approach, including Hackney: a practical non-prescriptive framework for developing a coordinated approach to supporting people experiencing multiple and complex needs. Further to this, Lambeth, Southwark and Lewisham have implemented a bespoke, person centred, coordinated package of support for people experiencing multiple needs⁵. This work is delivered by both statutory and voluntary sector partners and is being delivered through the Big Lottery Fulfilling Lives Programme. We recommend that MOPAC utilise the learning from these approaches to provide effective multi-agency support for those with multiple and complex needs.
- The London Social Prescribing Map provides a list of voluntary and community services that statutory organisations can refer clients to in order to address social issues such as housing, social isolation and family relationships, which can cause or contribute to health problems. We recommend that MOPAC make use of this map in order to identify organisations that can support the aims of the Police and Crime plan through providing services and expertise.

⁴ Clinks (2014). *More than a provider*. Online: http://www.clinks.org/sites/default/files/basic/files-downloads/clinks_more-than-a-provider_WEB_FINAL_0.pdf

⁵ See: https://www.biglotteryfund.org.uk/global-content/programmes/england/multiple-and-complex-needs/project_overview#lambeth

Keeping young people safe

- Members of the SFC network expressed concerns about the quality of services provided by the police and the wider CJS to children and young people and welcomed the plan's emphasis on keeping children and young people safe. Members suggested that CJS agencies and local authorities should seek to engage children and young people as well as their families/guardians in developing and reviewing community safety and safeguarding strategies. The voluntary sector is well-placed to support this engagement and act as an avenue of communication between statutory agencies and vulnerable children and families, particularly hard to reach groups.
- The SFC network were pleased to see an acknowledgement in the plan of the 'serious failures' of the MPS to deliver effective child protection and a commitment to working with the MPS to address these. Voluntary sector organisations often provide tailored support and advocacy for vulnerable children and have developed best practice models for effective safeguarding. We recommend that voluntary sector expertise is represented on the proposed independent group of child protection experts. The group should also include the voices of children with experience of vulnerabilities and where appropriate, their families and guardians.
- We welcome MOPAC's commitment to monitor equalities data with regard to young people coming to the notice of the police or those entering the criminal justice system. This will provide much needed detail on the possible drivers of the worrying BAME disproportionality in the youth justice system (42% of children in custody are from a BAME background⁶) as well as the interaction between other protected characteristics and involvement with the CJS. We also support the Traveller Movement's call for the 18+1 ethnic monitoring system, which monitors Gypsy and Traveller people to be introduced across the youth justice system.⁷
- The LVSC SFC network and Clinks are very positive about the plan's commitment to a multi-agency approach to diversion and prevention of young people at risk of being involved in crime, and for young ex-offenders. As outlined in the previous section, MOPAC should seek to engage the voluntary sector at a strategic level in providing wide-ranging support, tailored to the diverse needs of children and young people in London. This will require more co-ordinated service user involvement and should explore the use of a peer-led approach to meaningfully engage young offenders.
- SFC network members share the concerns of MOPAC around the prevalence of knife crime and welcome the commitment to developing a Knife Crime Strategy for London. Members felt that government and CJS agencies needed to be more proactive in involving parents and families in strategies to tackle knife crime, particularly where parents and families have already taken the lead in addressing problems, for example through leading campaigns to raise awareness of the causes of and solutions to youth violence.⁸
- We strongly welcome the plan's commitment to taking a trauma-informed approach to commissioning services for young people and believe this underpinning value will encourage a more joined up and holistic approach to supporting young people involved in and at risk of offending. We urge MOPAC to ensure that this approach is informed by young people with experience of the CJS and in particular those from groups that are over-represented in the CJS – in particular BAME and looked-after children and young people. This will ensure that commissioning strategies address the specific needs

⁶ Ministry of Justice (2017). *Youth custody report: December 2016*. Online: <https://www.gov.uk/government/statistics/youth-custody-data>

⁷ The Traveller Movement (2016). *Overlooked and Overrepresented: Gypsy, Traveller and Roma children in the youth justice system*. Online: <http://travellermovement.org.uk/wp-content/uploads/Overlooked-and-Overrepresented-Gypsy-Traveller-and-Roma-children-in-the-youth-justice-system.pdf>

⁸ See: <http://news.sky.com/video/the-point-saving-our-kids-from-gang-violence-10614222>

of these groups in order to achieve reductions in offending and reoffending and increase positive outcomes for young people at risk of offending. A best practice example of this is the work of Mac-UK⁹, a member of the SFC network that young people in the development of the policy affecting them. The organisation gives young people a voice to help them influence policy making and commissioning processes in public sector bodies in order to improve mental health outcomes for young people.

Tackling violence against women and girls

- The LVSC SFC Violence Against Women and Girls (VAWG) Expert Reference group continue to be concerned about the rise in sexual violence in London and would like clarity on how MOPAC will address this issue. We recommend that MOPAC consult with the reference group, and the wider voluntary sector, when developing their plans to address the rise in sexual violence in London.
- The LVSC VAWG group have been particularly concerned about an under-developed understanding within CJS agencies of the relationship between vulnerability for women and sex work and were pleased to see MOPAC's commitment to develop this. The voluntary sector can provide vital expertise in what works to address the vulnerabilities of women involved in the CJS and to support women to exit sex work.
- We welcome MOPAC's intention to secure additional funding for access to women's centres and recommend that MOPAC, in partnership with women's organisations, explores the possibility of developing a whole systems approach across London, delivered through a network of women's centres covering each borough of the city.
- SFC network members had significant concerns about the under-reporting of crimes by Eastern European and BAME women¹⁰ due to a lack of trust in the police and other CJS agencies. As discussed above, organisations are particularly concerned about the punitive use of immigration regulation and enforcement against refugee and migrant communities. Organisations felt this was being used disproportionately against women from refugee and migrant communities, with CJS agencies viewing them as offenders rather than victims. This punitive approach to women from refugee and migrant communities hinders strategies to address domestic abuse, sexual violence and trafficking by preventing women from accessing the CJS as victims. We recommend that MOPAC consider the specific needs and barriers experienced by BAME women, including those from refugee and migrant communities when developing strategies to support victims.

Standing together against extremism, hatred and intolerance

- BAME, refugee and migrant organisations felt that the plan's approach to extremism and hatred focuses too heavily on Islamic extremism and does not adequately address the threat of far-right ideology and preventing the radicalisation of those vulnerable to involvement in far right groups. In light of the recent rise in hate crime after the EU referendum, organisations felt that the importance of tackling racist ideologies and the related violence should be reflected in the Police and Crime Plan, with clear actions put in place to tackle this.
- Organisations working with and representing Muslim people have expressed concerns about the impact of Prevent on relations between Muslim communities and CJS agencies and the role of Prevent in driving inequalities for Muslims in the CJS. We recommend that MOPAC, in partnership

⁹ See: <http://www.mac-uk.org/projects/the-future/>

¹⁰ Imkaan (2016). *Capital Losses: State of the Specialist BME VAWG Sector in London*. Online: https://drive.google.com/file/d/0B_MKSoEcCvQwdjJXQm5GVDBISmM/view

with the Deputy Mayor for Social Integration, should review its implementation of the Prevent strategy to understand its impact upon relationships between CJS agencies and Muslim communities and its role in Muslim disproportionality in the CJS.

- Organisations working with disabled people suggested that the plan should acknowledge and seek to address disability hate crime, including a focus on how this impacts women. There is a feeling that disability groups have been largely left behind in the criminal justice strategies in London and more engagement from CJS agencies on hate crime would be welcomed.

Conclusion

LVSC and the SFC network will continue to engage with the development and implementation of the Police and Crime Plan, to support MOPAC in making London a safer city for all Londoners. LVSC in particular can assist MOPAC by bringing SFC groups together for further consultation and information gathering on topics of interest to the Deputy Mayor.

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