



Avon and Somerset
Police and Crime
Commissioner

**Avon and Somerset Office of the Police and Crime Commissioner
Victim Services Commissioning Plan**

2nd July 2018

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Introduction and context

This document sets out the Avon and Somerset Office of the Police and Crime Commissioner's (OPCC's) Commissioning Plan for victim services in Avon and Somerset.

It has been published following an engagement period on the OPCC's initial [Commissioning Intentions](#).

This document is informed by and published alongside:

- Annexe A – OPCC response to Victim Voice Report
- Annexe B - OPCC response to Stakeholder Survey feedback
- Annexe C – Equalities Impact Assessment
- Annexe D – OPCC response to the Victims Needs Assessment Recommendations.

For further contextual detail which forms the basis of this plan, please see the OPCC's [Commissioning Intentions](#) document.

Engagement Process

This commissioning process is a very important activity for the Avon and Somerset Police Crime Commissioner. From the very outset, the OPCC aimed to engage with multiple, varied stakeholders to ensure their views were heard and considered in the development of future victim services. The engagement period on the Commissioning Intentions ran from Monday 12 March 2018 – Sunday 3 June 2018. This comprehensive engagement over a period of 12 weeks was in line with the OPCC's VCSE charter.¹ The purpose of the engagement period was to receive feedback to inform this Commissioning Plan and procurement process.

Audience

The engagement was designed to hear the views from the following groups:

a) Victims / Service Users

A key audience for the OPCC throughout this process has been service users as well as victims who have not engaged with services. Given the importance of this element and the specialist skills required to engage effectively to receive feedback, the OPCC allocated a small amount of funding to appoint an independent organisation to undertake this on its behalf. Following a competitive process, TONIC was appointed by the OPCC to deliver:

- A written report providing feedback from victims on the draft commissioning intentions (June 2018)
- Victims to work with commissioners to develop service specifications (June- July 2018)
- Victims to be represented on the evaluation panels (November/December 2018)
- A final report which includes recommendations as to how service user involvement might be embedded in the ongoing management of the victim services contracts from April 2019 (March 2019)

¹ <https://www.avonandsomerset-pcc.gov.uk/Document-Library/TERM-ONE/2014/FINAL-Voluntary-Sector-PCC-charter---July-2014.pdf>

As part of the first part of this project views were obtained from 603 victims:

1. Survey responses (573)
2. Qualitative interviews (30)

The written report containing full details of the feedback provided by victims as part of this process is available [online](#).

The OPCC response to the themes raised as part of this project can be found at **Annexe A**.

b) Current Providers

The OPCC set aside extra time at 2017/18 quarter 4 contract review meetings to discuss the intentions with providers and hear their views. The quarterly Provider Forum also fell within this period. The OPCC received feedback which has been integrated into the stakeholder feedback at **Annexe B**.

c) Potential providers

The OPCC was keen to receive input from a wide range of stakeholders including potential providers. As such, the OPCC worked with Voscur and the Somerset Voluntary Sector Forum to arrange provider events across the force area:

- Thursday 17 May 2018, The Station, Bristol
- Tuesday 22 May, The Albermarle Centre, Taunton

The OPCC awarded a small amount of funding to these organisations to arrange these events which brought both additional expertise and independence to the process. In addition, the OPCC offered to attend other events taking place throughout the engagement period.

The events were designed to cover the Avon and Somerset area and facilitate maximum attendance from the market. Across the two events:

- 15 agencies were represented
- Largely voluntary sector agencies plus one commissioner
- The organisations had a range of specialist expertise in different client groups / crime types
- A mix of current and other providers

The OPCC gave an overview of the Commissioning Intentions, then working in groups participants reviewed and commented on the different elements of the commissioning intentions. Feedback from these events has been incorporated into the stakeholder feedback at **Annexe B**.

d) Stakeholders

Survey

To enable wider participation, a simple survey was hosted on Survey Gizmo and circulated widely to stakeholders and made available online. This sought feedback on each section of the Commissioning Intentions document as well as the specific questions posed within that document. This was shared with current providers, potential providers, stakeholders, interest groups and the general public.

45 full or partial responses were received from a range of sectors and agencies across Avon and Somerset and the survey was accessed and reviewed by over 40 others. Responses to the themes raised can be found at **Annexe B**.

Working with other Commissioners

The OPCC invited a number of other Commissioners to meet and explore the detail of the intentions document and any co-commissioning opportunities, including:

- Bristol Community Safety Manager
- BANES Community Safety Manager
- South Gloucestershire Community Safety Manager
- Somerset Community Safety Manager
- North Somerset Community Safety Manager
- NHSE Health and Justice Commissioner (SARC)
- South West Regional OPCC commissioning meeting

Briefing stakeholders

The OPCC updated partners on its intentions and invited feedback at the following Boards over the Engagement Period:

- Community Safety Partnerships:
 - South Gloucestershire - 16 March 2018
 - Somerset - 8 March 2018
 - BANES - 6 March 2018
 - North Somerset - 26 March 2018
 - Bristol - 9 May 2018
- Chief Executives Partnership meeting – 5 March 2018*
- Strategic Independent Advisory Group – 6 March 2018*
- Police and Crime Panel – Thursday 15 March 2018
- Safeguarding Board Chairs meeting – Thursday 3 May 2018
- Local Criminal Justice Board – Tuesday 15 May 2018
- SARC Strategic Commissioning Board - 16 May 2018

*two meetings took place in advance of the formal engagement period and attendees were directed to the PCC's website from the 12 March

Other documents

The Commissioning Plan has also been shaped by:

- An Equalities Impact Assessment (**Annexe C**)
- The OPCC's response to the Victims Needs Assessment (**Annexe D**)

Communications/PR

The OPCC created a page on the OPCC [website](#) to host information regarding the recommissioning exercise. There was a press release upon launch of the victim engagement along with regular social media activity to publicise the survey. This page will continue to be kept updated with information as it is released e.g. plans, tender opportunities etc.

Key decisions/changes following Engagement

Overall, the OPCC is pleased with the level of engagement and the range and diversity of participation. As a result suggestions made and feedback given throughout the engagement period, the OPCC has made the following decisions:

1. Annual grant to Unseen UK for the Modern Slavery Service – given the size of the existing grant, the local specialism required and the flexibility required to develop the local provision around the National Referral Mechanism (NRM) offer a business case is being prepared to allow for the OPCC to continue with the existing annual grant agreement which was awarded following a competitive process in 2015.
2. To maximise the responses from bidders, we have designed the procurement timeline and process in line with feedback, for example:
 - 7 week submission window for tenders
 - Contract award before the end of December 2018
 - Interview/presentation as part of evaluation
3. Specifications will be drafted to take into account specific points of feedback.
4. The titles of some of the services have been changed slightly to recognise the scope of the service (no significant changes to the overall service).
 - o The significant practical support offered as part of Lot 1
 - o The enhanced nature of support offered as lot 2
 - o The age ranges to be supported by lot 3.
5. While out of scope for recommissioning, the feedback received for the Lighthouse service throughout this process will be used to inform a work plan to consider and address key points raised.

A wide range of more detailed feedback has been taken on board, the details of which and the OPCC response are described in Annexes A – D.

Budget

According to the Avon and Somerset Police Crime Commissioner's priorities, a substantial budget has been allocated to securing victim services. It should be noted that this budget has been protected by the PCC and sees no reduction compared to the initial round of commissioning despite budgetary pressures. £118k of additional funds have been secured by the OPCC from NHS England for ISVAs as well as a small uplift in the additional PCC contribution.

As per the Commissioning Intentions, the overall budget for this Commissioning exercise is as follows:

Funding Source	Amount
Ministry of Justice Victims Grant	£1,953,439
Additional PCC Contribution	£846,348
NHS England ISVA Contribution including for 1 x men and boys ISVA	£118,815
<i>Minus separately commissioned services which are out of scope – see Commissioning Intentions for full details. Includes other victim services and the OPCC contribution to Lighthouse.</i>	<i>-£1,489,613</i>
TOTAL BUDGET FOR RECOMMISSIONING	£1,428,989

Commissioning Principles

Services will be commissioned in line with the following principles:

1. Support should be driven by need not offence type

A baseline, generic support service commissioned as part of this approach will ensure that a minimum level of emotional support is available to all victims of crime and ASB, regardless of offence type or where in Avon and Somerset the victim lives.

This approach is supported by the needs assessment which states that:

Given personal circumstances influence victims' needs, the best practice is to focus on victims' experiences with the incident instead of the type of incident.

2. Additional specialist support should be available for the most vulnerable

Many vulnerable victims display needs which may require more specialist support. As such, the OPCC proposes a staged approach, with specialist services being commissioned for those victims who require more intensive support. This aligns with the complexity of cases noted in the needs assessment.

3. Continuity of care for victims is paramount

This is a key element of the model; effective partnership working between Lighthouse and victim support providers is central to the proposal. This is supported by the needs assessment's analysis of good practice.

Moreover, early engagement with existing providers will take place so as to ensure effective transition arrangements are established as new contracts commence. This will ensure that there is no adverse impact on support arrangements for existing service users.

4. The full commissioning cycle should be consultative and collaborative

The OPCC seeks to adopt a consultative approach throughout the full commissioning process, ensuring the views of providers, partners (including the VCSE sector) and victims are used to inform the process. This will extend into ways of working during delivery of service, as recognised by the needs assessment as good practice:

The working practices of the OPCC, including their commitment to the services and their willingness to listen and engage at the ground-level had created an environment where practitioners felt able to work flexibly, challenge where necessary, and consider innovative approaches in order to meet the needs of their victims.

In order to reflect on the commissioning process as a whole, the OPCC will replicate a survey conducted in 2015 to learn from the process and inform future work.

Moreover, commissioned providers will be encouraged by the OPCC to work together as a network, sharing good practice, collaborating on projects and developing complementary working practices. This will continue to be fostered by the OPCC, for example via the Victim Provider Forum.

5. **Partnership working is crucial to ensure the best services for victims**

The services commissioned as part of this process are only one element of a complex and varied network of support which currently exists for victims across Avon and Somerset and it is important that local commissioners work collaboratively to ensure a cohesive approach.

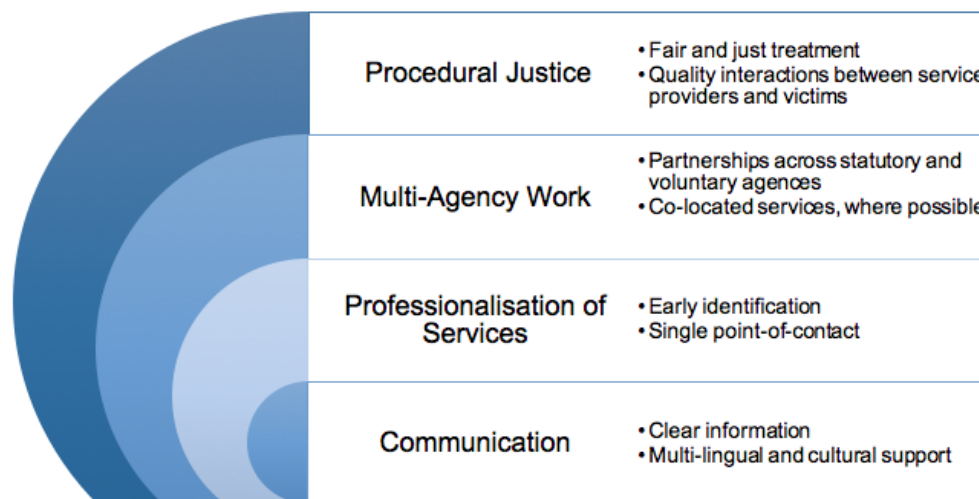
Where existing services exist, the OPCC will work with partners to ensure resources are appropriately allocated to prevent duplication, and to encourage local innovation in developing responses to those victims with more acute needs.

Moreover, as illustrated by the commissioning of CSE and SARC services, the OPCC will continue to work collaboratively with other commissioners where it makes sense to do so.

6. **Locally, regionally and nationally commissioned services should complement not duplicate**

The OPCC will continue to monitor progress in relation to a number of national funding arrangements, and will keep abreast of any developments as to the wider scope for national services and funding arrangements, including devolution.

7. **Services should be commissioned to deliver the four pillars of best practice for service provision²**



8. **Prevention and early intervention are crucial as part of the service offer to victims**

Given the increase in demand in a number of areas as highlighted by the Needs Assessment, it is important now that due focus is given to the need to prevent victimisation and intervene early to prevent the escalation of risk. This should ensure lasting change over the period of the contracts to reduce harm and therefore demand on services. The new Prevention and Early Intervention fund aims to encourage an emphasis on reducing victimisation.

9. **Longer contracts provide stability to the provision of services**

Contracts will be awarded for a longer period than during the initial round of commissioning (which was 3 years +1) to provide greater stability for providers, service users and other stakeholders. It should be noted that the MoJ funding provided to PCCs is currently awarded annually.

² Wedlock & Tapley (2016)

10. The OPCC will focus on ensuring efficient and effective services

The OPCC seeks to ensure value for money in the delivery of all commissioned services, with high expectations around efficiency, effectiveness and added social value, giving due regard to proportionality.

Commissioning Plan

The OPCC will procure the following services:

Service / Lot	Value p.a.	Procurement method
<p><i>1. A Practical and Emotional Support Service for adult victims of any crime or ASB</i></p> <p>The service will ensure individuals have appropriate practical and emotional support as well as advocacy all victims of crime or ASB irrespective of gender, race, religion or any other protected characteristic and whether they report to the Police or not. Priority will be given to victims who fall under the Victims Code of Practice (VCOP) priority groups.</p>	£330,000	<p>4 year contract with the option to extend: 4+1+1</p> <p>OJEU Open Tender – One Stage</p> <p>Lot 1</p>
<p><i>2. An Enhanced Adult Support Service for victims of any crime or ASB</i></p> <p>This enhanced service will be available for adult victims who have barriers or additional support requirements linked to or have been targeted because of their:</p> <ul style="list-style-type: none"> ✓ Race ✓ Religion ✓ Sexuality ✓ Gender Identity ✓ Mental health issues ✓ Learning difficulties ✓ Physical disabilities ✓ Problems associated with old age ✓ Problems associated with social exclusion or isolation <p>The service will ensure individuals have appropriate practical and emotional support as well as advocacy where it is identified that they have additional needs associated with the areas listed above, to help them cope and recover from their experience as a victim of crime or ASB and to engage with the criminal justice system if they choose to do so. It will provide tailored information and practical advice at each stage of their journey.</p>	£280,000	<p>4 year contract with the option to extend: 4+1+1</p> <p>OJEU Open Tender – One Stage</p> <p>Lot 2</p>

<p>3. <i>A Children and Young People's Support Service for victims of any crime or ASB up to the age of 18 (or 25 where there are additional needs)</i></p> <p>The service will reflect the particular needs of children and young people and ensure they have appropriate practical and emotional support as well as advocacy to help them to cope and recover from their experience as a victim of crime or ASB and to engage and communicate with the criminal justice system if they choose to do so. It will provide support to victims irrespective of when the offence took place, their gender, race, religion or any other protected characteristic and whether they report to the Police or not. It will provide tailored information and practical advice at each stage of their journey.</p>	<p>£165,000</p>	<p>4 year contract with the option to extend: 4+1+1</p> <p>OJEU Open Tender – One Stage</p> <p>Lot 3</p>
<p>4. <i>An Independent Sexual Violence Advisor (ISVA) Service</i></p> <p>The ISVA Service will cater for the needs of rape and sexual assault victims offering practical and emotional support as well as advocacy irrespective of when the offence took place, their age, gender, race, religion or any other protected characteristic and whether they report to the Police or not. It will provide tailored information and practical advice at each stage of their journey.</p> <p>This service is part funded by NHS England who has contributed funds for the wider service and specifically 1 x Men and boys ISVA.</p>	<p>£395,000</p>	<p>4 year contract with the option to extend: 4+1+1</p> <p>OJEU Open Tender – One Stage</p> <p>Lot 4</p>
<p>5. <i>A Restorative Justice Service for victims of any crime or ASB</i></p> <p>This service will enable for all victims of crime or ASB in Avon and Somerset to be offered Restorative Justice (RJ).</p> <p>The Restorative Justice service will bring together those harmed by crime, and those responsible for the harm, into communication, enabling everyone affected by a particular incident to play a part in repairing the harm and finding a positive way forward. The Restorative Justice service will be available at any stage of the criminal justice system.</p>	<p>£180,000</p>	<p>4 year contract with the option to extend: 4+1+1</p> <p>OJEU Open Tender – One Stage</p> <p>Lot 5</p>

<p>6. <i>Contribution to local specialist provision for victims of Modern Slavery</i></p> <p>This grant will specifically deliver:</p> <ul style="list-style-type: none"> - Support to victims as part of police / multi-agency visits before entry into the National Referral Mechanism (NRM) service (victim engagement) - Resettlement support once NRM-funded services end (victim support) 	<p>£40,000</p>	<p>No formal procurement process – continue with the current annual OPCC grant agreement to Unseen UK.</p> <p>The rationale for this is that:</p> <ul style="list-style-type: none"> - The service is inexorably linked to the review of the National Referral Mechanism and proposed changes to victim support services for potential victims of slavery meaning that whatever we fund locally needs to align to the model once finalised. It is understood that the Home Office is currently undertaking local pilots in order to inform the final design. - Unseen UK are embedded in the existing local processes and are the only local specialist provider in Avon and Somerset. - Wider partnership plans are being developed to create a support service based on the IDVA/ISVA model and flexibility in the use of OPCC funding is required in order to respond to this in the future.
<p>7. A small annual Prevention and Early Intervention Fund to be used collaboratively by the network of OPCC victim service providers to tackle issues jointly identified through service delivery in order to reduce victimisation. In the first instance, this fund will be available to the successful bidders of lots 1-6; subsequently, the fund may become available to other organisations working with victims, informed by emerging</p>	<p>Up to £45k available each year</p>	<p>Internally-run OPCC grant process open to successful providers for lots 1-6 only.</p> <p>While bidders to lots 1-6 may be asked a question about the Prevention Fund in the ITT stage of the procurement, the funding is not on offer as part of these contracts.</p>

needs and changes that affect victims.		As such, bidders for lots 1-6 should not assume that this funding will be available when preparing their tenders.
TOTAL	£1,435,000	

The Procurement Process

The procurement will be run by Avon and Somerset Strategic Procurement Services using an 'Open Tender Procedure' under the Light Touch Regime in accordance with the Public Contracts Regulations 2015.

The procurement will be managed using the Bluelight eTendering Portal. Providers can register as a Supplier on Bluelight via the following link <https://bluelight.eu-supply.com/>.

A contract notice will be published to OJEU on **17 August 2018** as per the indicative timetable below (noting that dates may be subject to change if required).

Providers will have approximately seven weeks to draft their tender submissions before submitting final bids through the Bluelight portal.

Tender responses will be evaluated on the basis of the most economically advantageous tender (MEAT) with the cost and quality evaluation criteria weighted as:

- 70% Quality
- 10% Supplier Presentations
- 20% Cost

Social value will be included in the Quality criteria and bidders will be asked to express the social value they propose to offer during the lifetime of the contracts. More information will be provided with the specifications.

The evaluation will be undertaken by a mixed panel of evaluators with tender submissions evaluated in accordance with the relevant marking guidelines and weighting criteria.

The OPCC will be responsible for the collation of TUPE relevant workforce information from incumbent providers and for making this available to potential bidders through the tender process.

Timetable

<i>EU Open Tender - One Stage</i>			
Procurement Activity	Start Date	End Date	No. Days
Dispatch Contract Notice to OJEU	17-Aug-18 (Fri)	17-Aug-18 (Fri)	1
ITT Issued and Response Period	17-Aug-18 (Fri)	04-Oct-18 (Thu)	49
Clarification Question Deadline	07-Sep-18 (Fri)	07-Sep-18 (Fri)	1
Tender Return Date	05-Oct-18 (Fri)	05-Oct-18 (Fri)	1
Evaluators Individually Score Responses	08-Oct-18 (Mon)	19-Oct-18 (Fri)	12
Evaluators Return Scores and Notes	19-Oct-18 (Fri)	19-Oct-18 (Fri)	1
Panel Evaluation Days	22-Oct-18 (Mon)	26-Oct-18 (Fri)	5
Panel Presentation Days	29-Oct-18 (Mon)	02-Nov-18 (Fri)	5
Panel Clarification Evaluation Day - Placeholder	05-Nov-18 (Mon)	05-Nov-18 (Mon)	1
Approval of Award Recommendation	06-Nov-18 (Tue)	19-Nov-18 (Mon)	14
Inform Suppliers	20-Nov-18 (Tue)	20-Nov-18 (Tue)	1
Alcatel Standstill Period	21-Nov-18 (Wed)	30-Nov-18 (Fri)	10
Agreement and Award of Contract	03-Dec-18 (Mon)	14-Dec-18 (Fri)	12
Contract Implementation	02-Jan-19 (Wed)	29-Mar-19 (Fri)	87
Contract Commences	01-Apr-19 (Mon)	01-Apr-19 (Mon)	1

Dates are indicative only and may be subject to change if required.

Annexe A

Annexe A - OPCC response to Victim Voice Report

Following an engagement exercise undertaken by TONIC on behalf of the Office of the Police and Crime Commissioner (OPCC), which heard the views of 603 individual victims and survivors of crime and ASB from across Avon and Somerset through a mixture of online survey and qualitative interviews, a [report](#) detailing the findings has been published.

The OPCC have carefully considered the feedback provided as part of this exercise and developed this document as a response. This response collates the themes which were fed back rather than responding to each individual comment. The OPCC have reviewed the report in detail and will take the views expressed into consideration as we move forward with the recommissioning process.

The OPCC would like to thank TONIC for their work in leading this engagement exercise and are grateful to all of those individuals who took the time to share their views and experiences in order to help us continue to develop services which meet the needs of victims and survivors.

What was most important to you after you were affected by crime?

Theme	OPCC Response
An effective and more visible police response, who listen to and believe what victims tell them.	The OPCC will share the full report with Avon and Somerset Constabulary so that they can reflect and learn from the views expressed by victims and survivors.
Better communication from the police with a dedicated, single point of contact.	<p>Avon and Somerset Constabulary's integrated victim care service Lighthouse provide a single point of contact for victims and a regularly in contact with them throughout the criminal justice process. Alongside this a nominated investigating officer also retains a responsibility for providing regular updates on the progress of the investigation.</p> <p>The OPCC will share the full report with Avon and Somerset Constabulary and Lighthouse so that they can reflect on and learn from the views and ensure the process is working effectively</p>
Specific support services throughout the criminal justice system.	<p>The services which will be commissioned by the OPCC will be available at all points of the criminal justice process and will be available whether individuals choose to report to the police or do not.</p> <p>The OPCC are currently exploring ways to ensure the services commissioned are closely aligned with other support such as the Witness Service which offer support at specific points within the process.</p>

Annexe A

<p>Help to feel safe, confident and cared for.</p>	<p>The services commissioned by the OPCC will be required to offer emotional and practical support which empowers and enables victims to cope and recover for their experiences of crime or ASB. This will be reflected in the specifications for the services to be commissioned.</p>
<p>Choice and control over the support which is available.</p>	<p>All services commissioned will be open to those who report to the police and those who do not.</p> <p>For those being referred to specialist services via Lighthouse, options will be outlined with the choice of which service to access resting with the individual.</p>
<p>Advocacy, counselling, emotional support and someone to talk to.</p>	<p>Advocacy, emotional support and someone to talk to will all be features of the services commissioned by the OPCC.</p> <p>The OPCC recognise the need for counselling and the challenges services which offer this type of support are under with regard to waiting lists. As the OPCC are not health commissioners, counselling provision does not fall within the scope of this process as detailed in the Commissioning Intentions document.</p> <p>The OPCC will share the findings of this engagement exercise with other commissioners such as Local Authorities and Clinical Commissioning Groups for their consideration.</p>

What types of support do you think should be available for victims of crime in Avon and Somerset?

Theme	OPCC Response
<p>Regular case updates from the police, with a dedicated single point of contact who is easy to access.</p>	<p>Avon and Somerset Constabulary's integrated victim care service Lighthouse provide a single point of contact for victims and a regularly in contact with them throughout the criminal justice process. Alongside this a nominated investigating officer also retains a responsibility for providing regular updates on the progress of the investigation.</p> <p>The OPCC will share the full report with Avon and Somerset Constabulary and Lighthouse so that they can reflect on and learn from the views and ensure the process is working effectively</p>
<p>Need for emotional support.</p>	<p>Emotional support will be a fundamental feature of all services commissioned by the OPCC.</p>

Annexe A

<p>Need for therapy, counselling and mental health support.</p>	<p>The OPCC recognise the need for this type of support and the challenges individuals face in trying to access it. As the OPCC are not health commissioners, this type of provision does not fall within the scope of this process as detailed in the Commissioning Intentions document. The OPCC will share the findings of this engagement exercise with other commissioners such as Local Authorities and Clinical Commissioning Groups for their consideration.</p> <p>All services commissioned by the OPCC will be required to demonstrate a good understanding of local pathways and access routes into this type of support and will be required to deliver support which takes account of past trauma. This will be reflected within specifications.</p>
<p>Staff should be caring and reassuring, offering a safe space for victims to access help and making follow up calls</p>	<p>The findings of this engagement exercise will be made available to potential providers as part of the tendering process, allowing them to reflect on feedback and build this into their approach.</p>
<p>There should not be waiting lists.</p>	<p>Whilst the OPCC recognise the impact waiting lists can have on individuals, due to limited resources and increasing demand, it is not always possible for service to avoid them. The OPCC works with all providers to understand demand and pressures on services and reviews waiting lists and the measures put in place to manage them as part of the performance management approach.</p>
<p>Services should be victim-led, offering tailored and personalised support, dependent of the type of crime and specific issues facing the individuals.</p>	<p>The OPCC recognise the value which comes from a victim-led approach and will not prescribe particular models of delivery as part of specifications. By commissioning by need rather than crime type, the aim of the OPCC is to ensure that victims receive a service which is tailored to their specific needs.</p>

If you needed support after a crime, how would you prefer to access this?

Theme	OPCC Response
<p>Support should be available face to face, over the phone and online. Advocacy support should also be available.</p>	<p>Services will be required to offer support via a range of means, this may include face to face, online and over the phone; providing individuals with the choice as to which they feel most comfortable with.</p> <p>Although services won't be required to work to</p>

Annexe A

	formal advocacy principles, services will be required to offer support which empowers and enables individuals to cope and recover from their experiences as a victim of crime.
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Do you think there are gaps in the services currently available in Avon and Somerset for victims?

Theme	OPCC Response
The police are over stretched and unable to respond as well as they could due to budget cuts affecting local police forces across the country.	Work is being undertaken to try and secure additional funding for policing from the Treasury and the PCC increased the policing part of the council tax by the maximum level allowed this financial year (£12 per year). Work continues to be undertaken by Avon and Somerset Constabulary to ensure the funding it does receive is used in the most effective manner possible.

Do you think the PCC should commission additional services to support victims of crime and ASB?

Theme	OPCC Response
More visible police on the streets.	As outlined above the PCC and Avon and Somerset police are pursuing all possible avenues to secure additional funding for the police and ensure the funding currently received is used in the most effective manner.
Support being provided to victims after the case or investigation has finished.	The OPCC does not intend to place a time limit on the support available from services and will encourage providers to understand the needs of individual and to be guided by them to help determine the best type of support to help victims cope and recover. The OPCC notes that demand for services is increasing and bidders will be asked to describe the breadth and depth of service in their proposals.
A range of classes, groups and workshops to help victims recover.	Although the OPCC will not be specifying a delivery model for services, the full report from this engagement exercise will be made available to those interested in tendering so that they can reflect and take into account the views put forward by victims and survivors.

Annexe A

How do you think services should be set up to encourage them to work together in the best way?

Theme	OPCC Response
Regular meetings between organisations.	<p>The OPCC recognises the value of partnership working and looks to foster positive working relationships between the services it commissions. Providers are brought together on a quarterly basis as part of a Provider Forum where they are encouraged to share ideas, challenges and explore opportunities for joint working.</p> <p>In addition and as part of the OPCC's work to encourage meaningful partnerships and collaboration, bidders will be required to demonstrate effective partnerships by submitting written agreements with their proposals.</p>
More information and promotion of the full range of services available to the public and other services.	The OPCC will work with providers, the Constabulary and other agencies in order to proactively promote services which are available.

Annexe B

Annexe B - OPCC response to Stakeholder Survey feedback		
The OPCC has collated and reflected on feedback from the online stakeholder survey, stakeholder engagement workshops and meetings with Community Safety partnership managers. Suggestions and points relevant to this recommissioning process have been responded to below.		
1	Victim needs	OPCC response
1a	A clear definition of vulnerability is needed in this context.	<p>The OPCC understands the request for a concise cross-agency definition of ‘vulnerability’, but recognises the challenges involved in achieving this. This is due to the number of partners who work to different interpretations of the term ‘vulnerability’ informed by their commissioners, demands on service and thresholds.</p> <p>As a guide, providers can refer to Avon and Somerset Constabulary’s definition of ‘a vulnerable person’ taken from the College of Policing and the VCoP: ‘Anyone who has been or is believed to be at risk of harm, abuse or exploitation following consideration of their individual circumstances and who is or may be in need of support or intervention’</p> <p>And/Or Any victim of crime who is entitled to an ‘enhanced service’ in accordance with VCOP’</p> <p>Vulnerable victims</p> <ul style="list-style-type: none"> • All victims who are under 18 years of age at the time of the offence <p>Or, the quality of their evidence is likely to be affected because they:</p> <ul style="list-style-type: none"> • suffer from mental disorder within the meaning of the Mental Health Act 1983 • have a significant impairment of intelligence and social functioning • have a physical disability or is suffering from a physical disorder <p>Intimidated victims</p> <ul style="list-style-type: none"> • The quality of the Victims evidence may be affected because of fear or distress about testifying in court. <p>Persistently targeted victims</p> <ul style="list-style-type: none"> • A victim who’s been repeatedly targeted as a direct victim of crime over a period of time; <p>The OPCC will also support the constabulary’s implementation of the BRAG assessment tool which will assist police officers to ascertain level of vulnerability and guide on next steps are required.</p>

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1b	Consider using term person with complex and multiple needs as those who do not self-identify as vulnerable may be put off seeking/accepting support from a vulnerable person's service.	In recognition of this point, the OPCC is simplifying the language used, and will refer to the service as the Enhanced Adults Support Service.
1c	Improved services are required for BaME victims.	<p>The OPCC will continue to commission an Enhanced Adult Support Service, available to those who experience barriers or are targeted because of their ethnicity. More generally, all services will be expected to meet the needs of the varied communities of Avon and Somerset.</p> <p>As a public body, the OPCC has an obligation under the Equalities Act 2010 to:</p> <ul style="list-style-type: none"> • Eliminate unlawful discrimination, harassment and victimisation and any other conduct prohibited by the Act; • Advance equality of opportunity between people who share a protected characteristic and people who do not share it; and • Foster good relations between people who share a protected characteristic and people who do not share it. <p>The associated equalities impact assessment (EIA) can be found at Annexe C below and describes how the commissioning plan could impact specific groups in our demographic.</p> <p>Demographics of those accessing services are monitored to ensure needs of the communities we serve are being met.</p>
1d	Accessible services for male victims.	Every service is required to be accessible to victims of all genders. For particular crimes where it has been identified that men may find it harder to report or access services, specific provision has been made such as the Men and Boys Independent Sexual Violence Advisor (ISVA).
1e	Accessible services for people with learning difficulties.	<p>All services will accept referrals from victims of crime who have learning difficulties. In addition, the Enhanced Adult Support Service will be available for adult victims who have barriers or additional support requirements linked to or have been targeted because of a learning difficulty.</p> <p>Beyond the remit of this recommissioning process, there is also a two year home Office VAWG Transformation Fund project focussing specifically on the needs of sexual assault victims with needs linked to mental health and/or learning difficulties.</p>

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1f	Support for specialist services for young people.	<p>In recognition of the expertise and approach required for this work, the OPCC will continue to commission a specific service for children and young people.</p> <p>In addition to this, the ISVA service also supports victims of all ages with specialist support for children and young people (Children and Young People ISVA).</p>
1g	Services for victims of non-recent sexual abuse.	The ISVA service will support victims, irrespective of when a crime happened. Other services outside of the scope of this commissioning exercise will support survivors of recent and non-recent sexual abuse.
1h	Services for indirect or secondary victims.	The OPCC has taken this point into consideration and will write into specifications that there is flexibility to support family and friends or indirect victims of crime as required.
1i	Support for the principle that support should be driven by need not offence type.	<p>The OPCC is pleased that this approach has received positive feedback, both in the needs assessment and during the engagement period.</p> <p>The majority of respondents agreed that a victim centred approach, based on need rather than crime type is the best approach. The OPCC acknowledges concerns that some victims of specific crimes require specialist support. There are services that are crime-type specific such as the ISVA and Modern Slavery services.</p> <p>Lighthouse will also refer to local specialist services that are not commissioned by the OPCC where appropriate such as Domestic abuse services for example.</p>
2	Partnership working	
2a	There should be more partnership working between all services, including those out of scope.	The OPCC recognises the value of partnership working and this is highlighted in the pillars of best practice detailed in our commissioning principles. In areas of known need, such as domestic abuse, it is of particular importance. The OPCC will work with fellow commissioners to promote multi-agency working across statutory and voluntary agencies.
2b	Encourage more joint working between providers.	<p>Good working relationships across a network of providers was a priority in the initial round of commissioning in 2014 and remains so in the new Commissioning Plan.</p> <p>The needs assessment recognised that stakeholders were generally positive about the partnership working between providers. The OPCC has encouraged this by co-hosting, with the Constabulary, the victim service Provider Forum meetings.</p>

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		<p>The commissioning principles state the expectation that providers work together as a network, sharing good practice, collaborating on projects and developing complementary working practices.</p> <p>The OPCC plans to further this way of working through the Prevention and Early Intervention Fund.</p> <p>As part of the OPCC’s work to encourage meaningful partnerships and collaboration, we will require bidders to demonstrate effective partnerships by submitting written agreements with their proposals.</p>
2c	Victim services should be linked in with social services.	<p>Providers will be expected to be aware of all other services which are able to meet victims’ needs. This will include the relevant referral pathways to access social services and make safeguarding referrals where required.</p> <p>The new closer working between Lighthouse and the Constabulary’s Safeguarding Coordination Units (SCUs) will further enhance access to relevant services when clients meet thresholds.</p>
2d	The OPCC should work with other OPCCs.	<p>The OPCC regularly works with OPCCs regionally and nationally and will continue to work with other OPCCs where it makes sense to do so. A recent example of a regional piece of work is the recommissioning of Sexual Assault Referral Centres (SARCs) across the South West.</p>
2e	The OPCC should support local plans and Community Safety Partnerships.	<p>The OPCC recognises the importance of local expertise in delivering local services. The OPCC is jointly working with partners to develop police and crime plans in each local area.</p> <p>The work of the OPCC and OPCC commissioned services should support and complement the work of the Community Safety Partnerships.</p>
2f	More should be done to improve victims’ general experience of the police and criminal justice system.	<p>As part of their reporting providers will be required to share feedback which can be used by the OPCC in its work to hold other agencies to account.</p> <p>While not in the remit of this piece of work, the OPCC is working to transform the local criminal justice system into a streamlined and victim-focused service. The OPCC along with partners Avon and Somerset Constabulary, Crown Prosecution Service, HM Courts and Tribunal service and HMP Bristol are co-funding a two year transformation project.</p>

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		As part of this project, The OPCC is working with criminal justice agencies to develop a single survey to capture the experience of victims at every point through their journey through the criminal justice service. Building on existing good practice in place with the ISVA Victim Survey, there is an opportunity to coordinate survey and feedback opportunities to ensure that the voice of the victim is heard, and develop robust mechanisms to ensure that feedback is used to inform continuous improvement of services for victims through the Local Criminal Justice Board and other mechanisms.
2g	The OPCC should work with co-commissioners, such as NHS and Public Health.	<p>The OPCC regularly consults with partners from other agencies and co-commissions services where it makes sense to do so.</p> <p>Indeed, the Commissioning Plan details engagement undertaken with commissioners to further advance this area of work.</p> <p>A recent example of this is working with NHS England and regional OPCCs to recommission the SARCs across the South West.</p>
2h	There has been improved co-working with the court-based witness service.	<p>The OPCC is pleased to receive feedback that there are examples of good working practice between providers and the Witness Service locally. The OPCC will seek to build upon this by inviting the Witness Service to the provider forum on a more regular basis.</p> <p>This is particularly relevant as the Ministry of Justice is currently considering further devolution of services.</p>
3	Interventions	
3a	Victims should receive more support through the criminal justice system.	<p>The OPCC does not specify a limit on support offered by its commissioned services. The needs assessment identified this as a preferable approach for meeting victims' needs. Service providers are given the flexibility to support as needed and manage capacity as required.</p> <p>The Lighthouse offers support throughout the whole criminal justice process through the allocation of a Victim and Witness Care Officer (VWCO).</p> <p>Additional support through the court process is available for victims from the nationally commissioned court-based witness service.</p>
3b	The OPCC should commission trauma specialists.	The OPCC recognises that some victims will need therapeutic intervention to recover from their experiences as victims. The OPCC considers this to be the remit of health commissioners,

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		<p>which is supported by national policy such as SARC Specification 30.³</p> <p>Indeed, in May 2018 NHS England announced that victims of sexual abuse will receive a lifetime of mental health care to help cope with trauma. The OPCC will continue to work with NHS England and Clinical Commissioning Groups locally on this important issue.⁴</p> <p>While not trauma specialists or counselling services, OPCC service specifications will call for services to ensure the delivery of their service is sensitive to the needs of clients and aware of the impact that trauma can have.</p>
3c	The OPCC should provide a definition of 'advocacy'.	<p>The OPCC uses the term advocacy in its documentation and specifications in the general sense as part of a service model that should include practical, emotional and advocacy support.</p> <p>Although services won't be required to work to formal advocacy principles, services will be required to offer support which empowers and enables individuals to cope and recover from their experiences as a victim of crime.</p>
3d	Victims of sexual violence need advocacy as well as support e.g. when the criminal justice system fails them.	It is the OPCC's expectation that the ISVA service will provide emotional support, practical help and advocate on their clients' behalf as identified in the individual's needs assessment.
3e	Perpetrator programmes are required to prevent future victimisation.	<p>The OPCC acknowledges the importance of challenging perpetrator's behaviour.</p> <p>However, that is not the remit of services funded through the Ministry of Justice Victims Grant.</p> <p>Consideration of interventions and support for offenders is taking place as part of the OPCC's work with the Reducing Reoffending Board and the Constabulary's ASCEND project.</p>
3f	Prevention and early intervention initiatives are important.	The OPCC is pleased to receive positive feedback about the implementation of a Prevention and Early Intervention Fund.

³ <https://www.england.nhs.uk/wp-content/uploads/2017/04/service-spec-30.pdf>

⁴ <https://www.england.nhs.uk/2018/06/lifetime-nhs-mental-health-care-for-sexual-assault-victims/>

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		<p>It will be available to the network of OPCC victim service providers to tackle jointly identified issues in order to reduce victimisation.</p> <p>The hope is that this will enable providers to work collaboratively and creatively to build upon the ideas already shared in the engagement period.</p>
3g	Services should offer intensive support rather than just signposting.	The OPCC recognises that different people will benefit from different types of intervention based on their needs and circumstances. The approach that has been taken is deliberately designed to have different levels of support to meet different levels of need. A comprehensive needs assessment ascertains a victim's needs and identifies how best to meet those needs, which may include direct support as well as signposting to other non-victim services.
4	The recommissioning process	
4a	The OPCC should share a summary of victim responses.	The OPCC has published a report summarising responses from the victim engagement work which is available on the here .
4b	The need for collaboration and joint working should be reflected in specifications.	<p>Collaboration is a key principle of the OPCC's commissioning and as such will be reflected in the specifications.</p> <p>As part of the OPCC's work to encourage meaningful partnerships and collaboration, we will require bidders to demonstrate effective partnerships by submitting written agreements with their proposals.</p>
4c	Longer contracts are welcomed.	The OPCC has heard providers' preference for longer contracts which offer stability and opportunity to invest in services and staff. The OPCC has an obligation to balance this with market engagement and robust contract management. As such the contracts will be awarded for 4 years with the option to extend for two further single years (4+1+1).
4d	There were some calls for an integrated victim support model, the overall response was in support of each service being procured as separate lots.	Following feedback during the engagement period, the OPCC will continue with the proposal for separate lots, to bring specialisms and diversity to service provision.
4e	Will the OPCC accept bids from a group of organisations?	<p>Under the Public Contract Regulations 2015, groups of suppliers may participate in procurement procedures. Compliant bids from groups of suppliers will be accepted.</p> <p>As part of our work to encourage meaningful partnerships and collaboration, bidders will be required to demonstrate effective partnerships by submitting written agreements with their proposals</p>

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4f	The Governance Board and Evaluation panels should be representative of the whole region and all providers.	<p>Members of the Governance Board sign a declaration of interest which states they will contribute to the commissioning process in a fair, transparent, accountable and impartial manner for the benefit of <i>all</i> communities in Avon and Somerset.</p> <p>The Board includes external representation from a voluntary sector advocate to represent the providers' perspective as well as a Police and Crime Panel Link member.</p> <p>Evaluation Panels will include a range of representatives so that bids can be assessed adequately from a range of perspectives.</p> <p>The OPCC is aware of the importance of equity of services and this will be reflected in tender documents.</p>
4g	Local Authority and a Clinical Commissioning Group representatives should be on the Recommissioning Governance Board.	<p>Careful consideration was given to the make-up of the governance board in order for it to perform effectively and the Terms of Reference have been agreed and set.</p> <p>Throughout the process, the OPCC has been working with other commissioners to inform decision making and this will continue throughout the procurement process.</p>
4h	The OPCC should ensure improved cultural awareness of external consultants.	<p>A provider's ability to deliver a piece of work is tested as part of a procurement process for external consultancy projects.</p> <p>As part of finalising the resources to accompany the victim engagement work for example, the external consultants worked with key expert stakeholders to ensure their work was accessible and culturally appropriate before final publication.</p>
4i	Positive feedback about the engagement process.	The OPCC felt it was important to ensure views of providers and partners and victims were used to inform the process so is pleased to receive positive feedback about the process.
4j	Allowances to be made if a provider is bidding for more than one lot.	<p>The standard application documents for a 'lotted' procurement process require that general information is provided only once. This eliminates the requirement to duplicate information and assessment.</p> <p>Specific responses are then required for each lot.</p>
4k	Not enough information has been given on what is excluded.	The Commissioning Intentions document gave details of services that are 'out of scope' and the rationale for this.

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		<p>The model of support services has been deliberately designed, providing support on the basis of need, rather than crime type, so there is some level of support for everyone who needs it.</p> <p>The OPCC sought feedback on gaps in provision during the engagement period. Additional services that were suggested have been considered and details are shown under the <i>Services</i> section of this document, starting at page 13.</p>
4l	The modern slavery service should not be subject to a procurement process.	<p>The OPCC recognises the modern slavery service being commissioned is different to the other services in many ways.</p> <p>There is nationally commissioned provision for the support of victims of trafficking and modern slavery and the OPCC contribution supplements this to plug the gaps before and after nationally funded support. As such, the Modern Slavery service will continue to be grant funded without a new procurement process under this Commissioning Plan.</p> <p>This will allow the OPCC to use its resources flexibly as the regional and national response to modern slavery develops.</p>
4m	What work is being done to cost each lot in order to inform decisions?	A cost analysis has been completed as part of the recommissioning process.
4n	There should be an increase in funding to reflect the growing number of victims including those with complex needs.	<p>The increase in complexity of need was identified as an issue in the 2017 <i>Tipping Point</i> report which states that the Force faces ‘increasingly complex challenges to keep communities, vulnerable victims and individuals safe’ and that ‘our demand is growing and becoming ever more complex.’⁵</p> <p>There has been no increase to the Victims Grant from the Ministry of Justice and the PCC’s contribution to the commissioning budget has been protected despite significant pressure on the overall police budget.</p> <p>The OPCC will continue to work closely with providers through contract management arrangements and encourage strong partnership working through the Providers Forum in order to ensure services remain flexible to be able to adapt to changing need. A new ‘Prevention and Early Intervention’ pot of funding will be made available to commissioned</p>

⁵ <https://www.avonandsomerset.police.uk/media/29964806/safe-sustainable-policing-report.pdf>

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		<p>services to encourage innovation and development of new ways of working to respond to changing need.</p> <p>In the current financial climate, particularly relating to public services, the PCC is clear that Victims Services are very important and demonstrates this by maintaining funding (i.e. no reduction) and putting in place new services for up to 6 years.</p>
4o	Was the Needs Assessment sufficiently informed by different equality groups?	<p>The needs assessment was designed to include interviews with stakeholders from commissioned services and Community Safety Partnerships. They shared their views based on the communities they represent.</p> <p>While feedback was not taken directly from victims for the needs assessment, a separate piece of victim work during the engagement period involved 603 diverse victims.</p> <p>This engagement work pro-actively reached out to the different communities represented in the force area to ensure they were given the opportunity to give their opinion.</p>
4p	The process of recommissioning services is disruptive and expensive.	<p>As a public sector organisation, the OPCC has a legal responsibility under the Public Contract Regulations 2015 and Contract Standing Orders to ensure competitive procurement processes are undertaken for contract opportunities over certain value thresholds. This includes a transparent and structured recommissioning process, which takes advantage of the new light touch regulations – part of our commitment to proportionality and minimising impact of such processes on public and providers’ resources as well as service users.</p> <p>This is designed to increase competition in the market, encourage innovation and flexibility, improve value for money for public bodies, and deliver better services to victims.</p> <p>The OPCC values the opportunity that a recommissioning process gives to stop, assess and understand the needs of victims of crime and ASB.</p> <p>The OPCC does however appreciate that this can be disruptive for some services. The OPCC has made sure that current providers are kept informed throughout the process and worked hard to accommodate their needs when designing the processes. The OPCC will work closely with providers to ensure that any changes are effectively managed so that disruption for</p>

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		<p>victims, providers and workforce is minimised.</p> <p>The need to lessen impact also informed the OPCC’s decision on contract length.</p>
5	Timescales	
5a	Longer is needed for victim engagement - tight timescales are an issue.	The OPCC recognises the need to balance the time allocated to the engagement period, the administrative tasks and allowing enough time for the tender process. This OPCC has worked hard to accommodate all needs within the 18 month recommissioning process.
5b	The allocated time for return of tender application is appreciated (6-8 weeks).	The procurement timetable allows seven weeks for bidders to submit their response to the tender. Part of the reason for this extended bidding period is that it begins in the school holidays. We have allowed more time and provided advance notice so that bidders are able to plan and respond comprehensively.
	A mixed response on the timescales, some considering them reasonable, others ambitious.	
5c	Providers need specific tender dates for planning.	<p>The Commissioning Intentions set a high level timeframe for the recommissioning process when they were published in March 2018.</p> <p>The OPCC welcomed feedback on the indicated timeframes during the engagement period.</p> <p>Having taken this feedback into consideration, a finalised timescale with specific dates has been published in the commissioning plan (which may be subject to change).</p>
5d	What time has been allowed in timescales for due diligence?	Although not specified in the timescales, due diligence is a key part of the procurement process. Time for this work will be included in the tender evaluation process.
6	Services	
6a	There should be better promotion of services and clarity on eligibility.	<p>All providers will be required to raise awareness of their services.</p> <p>The OPCC will work with providers during the mobilisation period after issue of contracts to ensure that all services are publicised, their remits clear and they are as accessible as possible.</p> <p>During the life of the current contracts the OPCC has promoted the services at events, online and at partnership meetings and these will continue.</p>
6b	There should be a force-wide standardised Domestic Abuse service.	While there may be benefits to a force wide provision for domestic abuse support, at this time the OPCC supports the local delivery of services.

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		<p>It is felt that Local Authorities are best placed to assess need and commission services locally.</p> <p>The OPCC provides Local Authorities with a Police and Crime Grant and a number of areas use this to support their domestic abuse services.</p> <p>The OPCC supports greater join up across local commissioners and services.</p>
6c	Support should be provided for those impacted by Parental alienation.	<p>While there is not a specific service to support those affected by parental alienation, the OPCC has been working with the Family Court to look at opportunities to bring parity of support for victims in civil proceedings (for example through special measures and access to support services).</p> <p>The OPCC has commissioned services according to need not crime type.</p>
6d	Online safety advice should be part of the services.	<p>A range of agencies have responsibility to ensure the public know how to keep themselves safe online. If someone is a victim of crime, linked with online activity, such as grooming, fraud or cyberstalking, the existing OPCC commissioned services will be able to offer support, according to their needs identified at assessment.</p>
6e	All services should support with all crimes including domestic abuse and hate crime.	<p>OPCC commissioned services will support victims of any crime and ASB, according to needs identified at assessment. This model of support services ensures that a minimal level of emotional and practical support is available to all victims of crime and ASB. An enhanced level of support is available for those with additional needs. Providers are also expected to refer to other specialist agencies where appropriate.</p>
6f	Services should be available for non-reporting victims.	<p>This is a requirement of the EU Victims Directive as set out in the OPCC's Commissioning Intentions document.</p> <p>The OPCC recognises that not all victims of crime will feel ready to report to the police.</p> <p>While Lighthouse supports only victims that have reported to the Police, all other services are available for self-referral for non-reporting victims. All services are required to have independent resources to promote their work and detailing how to make a referral.</p>
6g	Waiting lists are an issue for service users.	<p>It is the responsibility of each service to manage demand. While the OPCC does not specify details on waiting lists, the contract does set out a requirement for timely first contact at referral and performance and outcomes are monitored.</p>

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6h	Is Restorative Justice always appropriate?	The Restorative Justice Service must comply with national principles to ensure the work is safe and useful. The service does preparatory work and risk assessment before deciding if it is appropriate to proceed.
6i	The ISVA service should be expanded.	Over the life of the current contract, the OPCC is pleased to have secured extra funds for the ISVA service, which is reflected in the overall budget. The OPCC recognises the increase in demand and acknowledges the important role the service plays in working alongside other agencies.
6j	Provision should be culturally relatable.	The OPCC requires services to carry out targeted work to facilitate access and effective engagement with groups who face barriers in accessing support and reporting crime. Materials and practices should be culturally appropriate and inclusive. Staff will also have relevant equalities training.
6k	Specific hate crime provision should be commissioned.	<p>Apart from the Modern Slavery and ISVA service, all commissioned services are open to victims of any type of crime and ASB.</p> <p>The Enhanced Adult Support Service in particular, will be available for adult victims who have barriers or additional support requirements linked to or have been targeted because of their:</p> <ul style="list-style-type: none"> • Race • Religion • Sexuality • Gender identity • Mental health issues • Learning difficulties • Physical disabilities • Problems associated with old age • Problems associated with social exclusion or isolation. <p>While not specialist hate crime services, due to the design principles the Practical and Emotional Support Service, Enhanced Adult Support Service and Children and Young People’s service may all support victims of hate crime.</p> <p>In addition, there are a number of specialist hate crime services commissioned by Local Authorities across the force area.</p>

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6l	The Children and Young People's Service should be able to meet the specific needs of those relating to gang culture, knife crime, LGBT+.	<p>The main OPCC commissioned victim services are open to victims of any crime and are delivered according to their needs. The OPCC expects providers to be up to date with crime trends and have the necessary expertise to meet these needs. This includes the Children and Young People's Service.</p> <p>Other more specialist, local services are supported by the PCC through the Police and Crime Grant.</p>
6m	Criminal Justice services should be more representative of the diverse communities served.	The OPCC welcomes a more representative workforce within the Criminal Justice Service as highlighted in the Lammy Review . This echoes the PCC's priority detailed in the Police and Crime Plan of ensuring the constabulary has the right people, right equipment and right culture to deliver an excellent police service to our communities.
6n	Can you consider street conflict and gang reduction as separate services?	<p>The OPCC is commissioning force-wide services based on need rather than crime type. As such victims facing these issues would be able to access the relevant service to meet their needs.</p> <p>In addition to this, local specialist work is supported by the OPCC through the Police and Crime Grant which is awarded to local authorities to deliver projects and services to meet local priorities.</p>
6o	The Commissioning intentions grouped Modern Slavery and CSE together under forms of exploitation – could these be separated?	<p>The section referred in this comment was taken from the Police and Crime Plan.</p> <p>The Police and Crime plan will be refreshed and published in 2019 and the OPCC will note this suggestion for that process. The OPCC commissions a separate specialist Child Sexual Exploitation service which is not subject to this recommissioning process.</p>
6p	The OPCC to consider county lines issues as part of modern slavery remit.	While acknowledging the Lammy Review's recommendation on using Modern Slavery Legislation to better protect young victims of exploitation, the OPCC also recognises that 'county lines' incorporate different victim types and crimes. It does not necessarily follow that there has been an element of trafficking or slavery in every such case. It is the Constabulary / Lighthouse's role through their comprehensive needs assessment to ascertain the needs of the victim and refer them to the most appropriate service. The OPCC accepts it also has a role in raising awareness about the services on offer amongst the wider police service so they can make direct referrals if required.
6q	The OPCC should consider the introduction of Independent Modern Slavery Advocates, based upon ISVA roles, in addition to current services.	The OPCC is committed to continue the support of victims of modern slavery. The OPCC has limited resources and no additional budget to cover a new service but is willing work flexibly with partners as the response to modern slavery develops.

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6r	<p>Consideration should be given to how vulnerable children who have been the victims of exploitation are expected to access services that are principally designed for adults.</p>	<p>Outside the remit of this recommissioning, there is the specialist CSE service which has been jointly commissioned by the OPCC and Local Authorities, which works specifically with children and young people as well as offering advice, support and guidance to the professionals that already work with them.</p> <p>Under this Commissioning Plan is the Children and Young Peoples Service which is specifically for young victims of any crime. Without more detail on the issue in question, the OPCC is unable to comment further.</p>
6s	<p>There is an overlap of services and duplication of work.</p> <p>Consider ways of minimising the number of professionals that the most vulnerable victims need to relate to.</p>	<p>The model has aimed to streamline services and the victim's experience as far as possible. The Lighthouse acts as the central point of contact for victims going through the CJS and makes onward referrals, sharing information as appropriate. The OPCC encourages providers to collaborate with other service providers to find effective ways of working.</p>
7	<p>Geographical coverage / rurality</p>	
7a	<p>Services need to adequately cover Somerset, consider accessibility, and understand the needs of victims in urban centres.</p>	<p>The OPCC recognises the challenges faced by victims across the more rural parts of the force area. This is covered in the Equality Impact Assessment.</p> <p>Providers will be encouraged to offer their services in ways to overcome these barriers through the design of their services.</p> <p>The OPCC accepts that a provider's administrative base does not necessarily dictate the reach of its service.</p>
8	<p>Devolution of the Court-Based Witness Service</p>	
8a	<p>Support for the ring-fencing of funds if services are devolved.</p>	<p>The devolution agenda is being led by the Ministry of Justice. The OPCC expects that any services that are devolved will have clear guidance around the budget allocation.</p>
8b	<p>Support for the devolution of homicide and sexual violence services to be commissioned by PCCs.</p>	<p>The Ministry of Justice is currently engaging with stakeholders on the potential devolution of the Court-based Witness Service and Rape Support Fund. The OPCC will carefully consider the potential benefits of this with local partners in making any commitment to taking responsibility for commissioning of these services locally.</p> <p>As far as the OPCC is aware, the Homicide Service is not currently being considered for devolution.</p>

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8c	<p>General support of devolution of the witness service to OPCC.</p> <p>If devolved, there may be more opportunity for innovation and streamlined working.</p>	<p>The OPCC will carefully consider the potential benefits of this with local partners before making any commitment to taking responsibility for commissioning of these services locally.</p>
9	Lighthouse	
9a	<p>General feedback on the Lighthouse service.</p>	<p>The OPCC has received useful feedback on the Lighthouse service throughout the engagement process. While not within the scope of this recommissioning, the OPCC will work with Lighthouse to take this forward.</p>
9b	<p>Why is Lighthouse out of scope?</p>	<p>The Commissioning Intentions explained the rationale behind the 'out of scope' services which includes Lighthouse.</p>
10	Ministry of Justice / national issues	
10a	<p>The EU Victims Directive will no longer apply after March 2019.</p>	<p>The OPCC has been advised that European Union Member States must give legal effect to a Directive through their own country's laws. This means that the Directive takes effect in the UK via UK law.</p> <p>So when no longer in the EU, the UK law that gives effect to the Directive remains in place until such time as it is changed/removed. In this case it is the Victims Code of Practice – a statutory code of practice (S.33 of Domestic Violence, Crime and Victims Act 2004. The code applies to all criminal justice agencies and will not be affected by the UK's exit from the EU.</p> <p>After this time, the OPCC will cease referencing the EU Directive and refer to the 2004 Act and the statutory Code of Practice issued under that Act.</p>

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10b	It is important that the new Ministry of Justice reporting framework ties in with OPCC requirements.	<p>The OPCC is currently working with the Association of Police and Crime Commissioners and Ministry of Justice to ensure the views of service providers have been and will continue to be consulted in the review of Ministry of Justice Performance Outcomes Framework.</p> <p>The OPCC is supporting providers to be able to report against the new framework</p> <p>The OPCC also plans to standardise its own reporting requirements to ensure the effective capture of useful data. The OPCC reporting requirements will be detailed in contract management plans for the new contracts starting April 2019.</p>
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Annexe C - Equality Impact Assessment

Policy name and number	Victim Services – Commissioning Plan 2018
Date	2 nd July 2018
Policy Owner	Avon and Somerset Office of the Police and Crime Commissioner (OPCC)
Author of the Equality Impact Assessment	Donna King, Commissioning Support Officer <i>Reviewed and agreed at the Victims Recommissioning Board June 2018</i>

<p>What is the Public Sector Equality Duty?</p> <p>Section 149 of the Equality Act 2010 is the Public Sector Equality Duty and came into force on 5 April 2011. The Duty applies to public bodies and others carrying out public functions.</p> <p>There are three main aims of the Duty that all public bodies must show due regard to:</p> <ul style="list-style-type: none"> • Eliminate unlawful discrimination, harassment and victimisation and any other conduct prohibited by the Act; • Advance equality of opportunity between people who share a protected characteristic and people who do not share it; and • Foster good relations between people who share a protected characteristic and people who do not share it. <p>In addition to the protected characteristics listed in the Equality Act 2010, this document will also consider the local demographic and features that are particular to Avon and Somerset.</p> <p>Due regard means consciously thinking about these three aims as part of everyday decision making. This document details the due regard given to these aims in the recommissioning of victim services.</p>
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Stage 1 Defining the Aims of the Policy and Primary Considerations

Question	Answer
<p>1. What is the aim and projected outcome of this plan?</p>	<p>The aim of the Victims Services Commissioning Plan is to commission a range of support services for victims of crime and Anti-Social Behaviour (ASB) in Avon & Somerset, helping to achieve priorities set out in the PCC's Police and Crime Plan, particularly priority 1: <i>'Protect the most vulnerable from harm'</i>.</p> <p>The Commissioning Intentions document set out the OPCC's proposal to commission similar services to those that were originally put in place in 2014 and this has been confirmed in the Commissioning Plan:</p> <ul style="list-style-type: none"> • Practical and Emotional Support Service • Enhanced Adult Support Service • Children and Young People's Service • Independent Sexual Violence Advisor Service • Modern Slavery Support Service • Restorative Justice Service <p>In addition there will be a small annual Prevention and Early Intervention Fund to be used collaboratively by commissioned providers.</p> <p>Further detail about the Commissioning Plan including principles, budget and</p>

	the procurement approach can be found in the document above.
<p>2. Who is likely to be adversely affected by this plan?</p>	<p>When considering the groups with protected characteristics listed in the Equality Act 2010, we have used phraseology that has been agreed more appropriate in conjunction with people from the respective groups.</p> <p>While assessing available data on victims of crime, it is important to consider the diversity within the equalities groups, i.e. 'When looking at 'ethnicity' it is important to avoid undertaking assessments framed around a single category of 'BME' (Black and Minority Ethnic), as it can result in a homogenous understanding that renders it more difficult to assess any emerging differences/issues between different minority groups.'⁶ This document considers the impact of the proposed provision on those living with specific disabilities as well as the broad term disabled.</p> <p>In order to give a wider context to the recommissioning of victim services in Avon and Somerset, we will first consider the national picture. The victims needs assessment conducted by Perpetuity⁷ identified that nationally certain groups have unmet needs as victims of crime and ASB. Some key points are copied below:</p> <p><i>4.14 The literature highlights numerous groups of victims whose support needs are not being met. Of significant interest to the work at hand, these groups include victims with disabilities/special needs; low-medium risk domestic abuse victims; victims of trafficking and exploitation; victims of fraud and other cybercrime typologies; and victims with no recourse to public funds (e.g. migrants).</i></p> <p>Nationally it has been identified that there are gaps in provision for particularly vulnerable victims:</p> <p><i>4.15 Notably absent are services for victims of hate crime, victims with mental health issues, and victims with disabilities/special needs. ; The services that do exist typically lack the ability to provide support and information in a way that caters to different communication capacities (e.g. languages differences, lower levels of reading comprehension).</i></p> <p><i>4.16 The literature emphasises that victims of hate crime are the least likely to have their needs met, as well as the least likely to have access to services. Victims of hate crime's main unmet need is a lack of awareness of how to report the incident.</i></p>

⁶ Home Office, VAWG Commissioning Toolkit (2016)p. 30

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/576238/VAWG_Commissioning_Toolkit.pdf

⁷ <https://www.avonandsomerset-pcc.gov.uk/Document-Library/TERM-TWO/Victims/Recommissioning-2018/PRCI-Victim-Needs-Assessment-in-Avon-Somerset-2018-Final-Report-Public-version.pdf>

	<p>Pressure on statutory services was found to be an issue nationally.</p> <p><i>4.17 Other frequently cited unmet needs include those for victims with mental health issues. This group of victims' main unmet need is that there is only a low level of support available. These victims require early intervention, access to treatment, and 24/7 responses, all of which are lacking under current statutory service provisions.</i></p> <p>The gaps in statutory provision means that those with mental health needs are relying on support services so will be impacted by any change.</p> <p><i>4.18 For young victims, there is a lack of specialist services and early intervention. There is also a lack of services that empower young people to keep themselves safe.</i></p> <p><i>4.19 For elderly victims, the main unmet need is a lack of protection, especially for repeat victims. There is also a lack of ability to access services.</i></p> <p><i>4.20 The fragmentation of support, inability to access long term support (particularly for victims of domestic abuse, sexual violence, and honour based violence), inability of those with no recourse to public funds to access support, inability of support to reach new and emerging communities, lack of support for BME groups, and low levels of support for male victims are other commonly cited unmet needs.</i></p> <p>The victims needs assessment shows that nationally people from equalities groups are less likely to report crime and access support. Targeted work is needed to increase reporting of crime within these communities.</p> <p>Referring specifically to victims and survivors of sexual offences, the NHS England strategic direction for sexual assault and abuse services says '<i>we need to focus our prevention efforts. This includes the lesbian, gay, bisexual and transgender (LGBT) communities, the black and minority ethnic communities, those with learning disabilities and sex workers, as well as all age groups within the prison population</i>'.⁸</p> <p>Alongside recognised protected characteristics, an added consideration is that of accessibility due to spatial inequality. Avon and Somerset is one of the largest Police force areas in England and includes a broad range of rural and urban settings. While living in a sparsely populated rural area is not a protected characteristic, it does create a barrier to accessing services. It is also likely that those on low income, the very young or the very old will be more impacted by this when looking to access services.</p> <p>This assessment seeks to analyse the impact of any change to existing</p>
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⁸ <https://www.england.nhs.uk/wp-content/uploads/2018/04/strategic-direction-sexual-assault-and-abuse-services.pdf> pg. 12

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	provision for victims of crime and also ensure that any opportunity to advance equality of opportunity to services, encourage reporting of crime and build resilience across all communities within the force area is maximised.
3. Are there associated policies / documents and if so, what are they?	Avon and Somerset Police and Crime Plan ⁹ Victim Needs Assessment – published March 2018 ¹⁰ Commissioning intentions – published March 2018 ¹¹ Commissioning plan – June 2018 (above from page 2) Victim voice – Engagement report – published July 2018 ¹² Current victim service providers performance reports 2017-18 (unpublished)

Stage 2 Considerations of Available Data and Research

Question	Answer
<p>1. Please state the following:</p> <p>a) What data have you collected and what are your conclusions from the data?</p> <p>b) Where did you get the data from?</p>	<p>The OPCC has looked at the population data for the Avon and Somerset area including breakdown of ethnicity, taken from the Victims Needs Assessment 2018 and Avon and Somerset Police and Crime Plan 2016-2021¹³</p> <p>Information on victims of crime is taken from Crime Survey for England and Wales.</p> <p>National crime data is taken from Home Office statistics report on hate crime 2016/17¹⁴ and Office for National Statistics data on crime types¹⁵.</p> <p>Avon and Somerset Constabulary hate crime data is taken from FOI requests published online.</p> <p>A provider mapping exercise collated information on potential providers from across the force area. This was added to our list of stakeholders who were invited to comment on the commissioning intentions, and invited to engagement events.</p> <p>Providers were also asked to link external consultancy Tonic with victims so that their views can be fed into the process. Tonic have also particularly targeted groups who may be underrepresented in the reporting of crime and the accessing support to obtain their views. Responses from the external engagement with victims of crime and ASB include the demographic information about the participants. This allows us to check that members of the equality groups are being heard and take their views and experiences into consideration.</p> <p>The OPCC has referred to current service providers' annual reports 2017-18</p>

⁹ <https://www.avonandsomersetplan.co.uk/>

¹⁰ <https://www.avonandsomerset-pcc.gov.uk/Partnerships/Victim-Services.aspx>

¹¹ *ibid*

¹² <https://www.avonandsomerset-pcc.gov.uk/Document-Library/TERM-TWO/Victims/FINAL-ASPCC-Victim-Consultation-v1.6-TONIC.pdf>

¹³ <https://www.avonandsomersetplan.co.uk>

¹⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/652136/hate-crime-1617-hosb1717.pdf

¹⁵ <https://www.ons.gov.uk/>

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	for equalities data on the victim who accessed support during the reporting period. Data is collated on ethnicity, religion, having a disability, gender, sexual orientation and gender. This gives an assessment of how current provision is meeting the needs of equality groups.
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Stage 3 Assessment of Impact

Question	Answer
<p>1. Please state:</p> <p>a) how you think the plan could have an adverse impact on Equality Group/s; and</p> <p>b) the extent of the impact</p>	<p>1.1 Age</p> <p>Consideration has been given in the Commissioning Plan to meeting the needs of different age brackets, particularly children and young people and older people.</p> <p>In recognising the specialisms required to work with children and young people, the Commissioning Plan includes a service for victims of crime and ASB up to the age of 18 (or 25 where there are additional needs).</p> <p>Despite experiencing the lowest proportion of crime,¹⁶ older people have a higher perception of risk of victimisation and, thereby, a higher fear of crime than any other age group.¹⁷ Elderly people are particularly concerned about online crime and identity fraud. It is also recognised that there are longer lasting negative outcomes post-victimisation for elderly victims than any other age group.¹⁸</p> <p>While there no specific older victim service in the Commissioning Plan, all services (Children and Young People’s service excluded) accept referrals from adults of all ages. In fact, 9% of the emotional support service’s clients in 2017-18 were over 65. Support provided included practical support around personal alarms and security items thus easing their fears around re-victimisation.</p> <p>In addition to this the Enhanced Adult Support Service will continue to be available for victims who face barriers or require additional support linked to problems associated with old age and social isolation. This addresses the feedback from victims stressing the importance of support agencies understanding vulnerability, e.g. the specific needs of particular groups such as the elderly.¹⁹</p> <p>The impact of travel times should be considered for young and older people across the whole of force area, i.e. so that young people in rural areas are not discriminated if not able to travel to centralised locations to access services.</p>

¹⁶ <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/peoplegreatlyoverestimatetheirlikelihoodofbeingrobbed/2017-09-07>

¹⁷ <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/publicperceptionsocriminenglandandwales/yearendingmarch2016>

¹⁸ <https://www.avonandsomerset-pcc.gov.uk/Partnerships/Victim-Services.aspx> p.22

¹⁹ <https://www.avonandsomerset-pcc.gov.uk/Document-Library/TERM-TWO/Victims/FINAL-ASPCC-Victim-Consultation-v1.6-TONIC.pdf> p. 23

Young people are less likely to have access to their own transport or be able to afford public transport.²⁰ Older people may rely upon rural transport services (which have seen reductions due to austerity measures) resulting in a poorer level of access outside cities and major towns. Accessibility due to geographical considerations is considered in more detail below.

1.2 Disability

Campaigners have felt victims of disablist hate crime have been overlooked in national provision²¹

Locally victims with disabilities (mental or physical) have said they want to work with someone who knows what options were available to support people through the court process e.g. registered intermediaries²².

1.2.1 Physical impairment

Tonic's victim survey sought to reach the underrepresented and those not currently accessing services. 10% of respondents to the survey stated they had a physical disability. They said victims of crime may have been targeted because of a physical impairment that identifies them as vulnerable or less able to protect themselves: *'a wheelchair user cannot retreat, turn round to get away from the perpetrator.'*²³ Victims also expressed a desire for specialist support: *'I think there should be support from a disabled people-led organisation, for disabled survivors of a crime.'*²⁴

All services will accept referrals from those with a physical disability and the OPCC expects providers to have the resources to meet the needs of their clients. It is recognised that mobility and ability to access support services may be impacted by a victim's physical impairment:

*'Accessibility would have been good to cover. I was being seen in winter and this is especially difficult for me. They could have asked whether I have any mobility need or was there anything they needed to know. It would have been a welcoming thing to be offered that first coffee.'*²⁵

This needs to be factored into the individual's support plan. As such it is important that services ask at initial assessment if any adjustments need to be made in order for the victim to be able to access support.

In addition, the Enhanced Adult Support Service will continue to be available for adult victims who have barriers or additional support requirements linked

²⁰ <http://www.acre.org.uk/rural-issues/transport>

²¹ <https://www.disabilitynewsservice.com/governments-hate-crime-plans-unforgiveable-failure-on-disability/>

²² <https://www.avonandsomerset-pcc.gov.uk/Document-Library/TERM-TWO/Victims/FINAL-ASPCC-Victim-Consultation-v1.6-TONIC.pdf> pg.31

²³ *ibid* pg. 36

²⁴ *ibid* pg. 36

²⁵ *ibid* pg. 36

to or have been targeted because of their physical disabilities.

1.2.2 Learning Difficulties

People with learning difficulties are less likely to report or engage with services and face challenges during the court process:

*“It is estimated that only 6% of cases of alleged sexual abuse of people with a learning disability are prosecuted. In a study of 284 suspected cases of sexual abuse of people with a learning difficulty only a quarter (63 cases) were investigated by the police. Just two of the cases (less than 1%) proceeded to court and only one resulted in a conviction”.*²⁶

One of the priorities for the victim engagement work was reaching the underrepresented and ensuring they had opportunity to give their opinion. An easy-read version of Tonic’s victim survey was distributed to maximise accessibility and opportunity to respond. 3% of respondents to the victim survey self-identified as having a learning difficulty or disability.

Victims’ responses highlighted the need for an advocate throughout the criminal justice process in order to support the victim but also explain their needs to other professionals: *‘The judge doesn’t understand that autism is different for everyone – we all have different communication needs.’*²⁷

All services will accept referrals from those with a learning difficulty and will be expected to have the expertise and resources to meet their clients’ needs. In addition, the Enhanced Adult Support Service will continue to be available for adult victims who have barriers or additional support requirements linked to or have been targeted because of their learning difficulties.

Outside the remit of this commissioning plan it should be noted that from 2017-18, the Home Office has awarded Avon and Somerset a three year grant from the Violence Against Women and Girls (VAWG) Transformation Fund for an enhanced ISVA provision for people with Learning Difficulties and/or complex mental health needs. The project will be evaluation and the OPCC will facilitate sharing of learning and good practice from this project between providers.

1.2.3 Mental / emotional distress

Victims of all crime types report adverse effects from their experiences impacting their ability to cope. Around half of respondents to the victim survey specifically mentioned the need for emotional support, therapy,

²⁶ (VOICE UK, Mencap and Respond, Behind Closed Doors: Preventing sexual abuse against adults with a learning disability)

²⁷ <https://www.avonandsomerset-pcc.gov.uk/Document-Library/TERM-TWO/Victims/FINAL-ASPCC-Victim-Consultation-v1.6-TONIC.pdf> p. 31

	<p>counselling and mental health support through professional and trained staff.²⁸ Stakeholder feedback echoes this and highlights the gaps in provision and long waiting lists as issues for victims²⁹</p> <p>The OPCC recognises that some victims will need therapeutic intervention to recover from their experiences as victims. The OPCC considers this to be the remit of health commissioners, which is supported by national policy such as SARC Specification 30.³⁰</p> <p>Indeed, in May 2018 NHS England announced that victims of sexual abuse will receive a lifetime of mental health care to help cope with trauma.³¹ The OPCC will continue to work with NHS England and Clinical Commissioning Groups locally on this important issue.</p> <p>While not trauma specialists or counselling services, OPCC service specifications will call for services to ensure the delivery of their service is sensitive to the needs of clients and able to identify and be aware of the impact that trauma can have.</p> <p>The OPCC also recognises that the support services play a vital role in meeting the emotional needs of victims during their support. Victims acknowledged the important role of support services while waiting for specialist therapeutic interventions.³²</p> <p>All services will accept referrals from those with a mental health issue whether pre-existing or unrelated to the crime or as a result of their experiences. The current Adults Service reports that 100% of clients accessing the service have a disability or vulnerability and 79% of clients reported a mental health issue. The service is meeting the complex and interlinked needs of victims of crime who identify as disabled.</p> <p>The Enhanced Adult Support Service will continue to be available for adult victims who have barriers or additional support requirements linked to or have been targeted because of their mental health.</p> <p>1.3 Ethnic origin</p> <p>There are 110,000 people with a Black Asian or minority ethnicity (BAME) in Avon and Somerset, representing 7% of the population across the region. This increases to 16% when looking at the population in Bristol.</p>
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²⁸ *ibid* p.5

²⁹ Stakeholder survey feedback, annexe B p.18

³⁰ <https://www.england.nhs.uk/wp-content/uploads/2017/04/service-spec-30.pdf>

³¹ <https://www.england.nhs.uk/2018/06/lifetime-nhs-mental-health-care-for-sexual-assault-victims>

³² <https://www.avonandsomerset-pcc.gov.uk/Document-Library/TERM-TWO/Victims/FINAL-ASPCC-Victim-Consultation-v1.6-TONIC.pdf> p. 43

Data on ethnicity of victims of crime is not currently routinely and reliably captured in Avon and Somerset. The Lammy review³³ recommended a cross-criminal justice system approach to recording data on ethnicity to enable more scrutiny in future. The OPCC will work with the Constabulary and support providers to improve equalities data capture and continue to monitor data to ensure that service provision is meeting the needs of the communities it serves.

The issue of trust in the Criminal Justice System was identified as a key principle in the Lammy report. Trust is low not just among defendants and offenders, but among the BAME population as a whole and this would include victims. 51% of people from BAME backgrounds born in England and Wales who were surveyed in the 2015 Crime Survey for England and Wales believe that ‘the criminal justice system discriminates against particular groups and individuals’. Representation within the CJS and ‘demystifying’ the decision making process will help to build respect for the rule of law, which in turn will improve trust so more victims from a BAME background feel able to report crime and access support on offer. Fostering good relationships by ensuring the Constabulary has the right people, right equipment and right culture to deliver an excellent police service to our communities is a priority for the PCC as detailed in the Police and Crime Plan.

The Lammy review also highlights how young offenders, a disproportionate number of who are from a BAME background, should also be considered as victims of exploitation, particularly in gang activity and drug crime. The OPCC is leading a Local Criminal Justice Board Lammy Review Sub Group. The Youth Offending Service is a member of this group and will be working on this issue.

Hate crime figures give a picture of where the victim’s ethnicity or perceived ethnicity has been flagged by police or considered a factor in the crime perpetrated against them. Nationally, In 2016/17, there were 80,393 offences recorded by the police in which one or more hate crime strands were deemed to be a motivating factor. Of this figure, 62,685 (78%) were race hate crimes.³⁴ Crimes recorded as motivated by racial hate in Avon and Somerset increased in 2016 to 1953 from 1453 the year before and again to 2254 in 2017³⁵. The upward trajectory of recorded crimes with a racial element may be due to the spike in incidents following events such as the EU referendum and terrorist incidents. However, there is also an increased awareness of hate crimes and how to report them. This coincides with improved recording of incidents with a ‘hate crime’ flag within the Constabulary.

All services will be expected to meet the needs of victims from different backgrounds, ensuring that their service is accessible and able to meet their

³³ <https://www.gov.uk/government/organisations/lammy-review>

³⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/651851/hate-crime-1617-hosb1717snr.pdf

³⁵ <https://www.avonandsomerset.police.uk/158140-race-religiously-motivated-hate-crime-reports-since-2009>

needs. The OPCC will continue to commission an Enhanced Adult Support Service available to those who experience barriers or are targeted because of their ethnicity.

Victims from BAME backgrounds are accessing current support services. Notably, the current modern slavery service reports 47% of their clients were from a BAME background in 2017-18. This is above average but also reflects the demographic of victims of human trafficking and modern slavery. The current Vulnerable Adults Service reports that 43% of new clients were from BAME groups in the last quarter of 2017-18 which is an increase on previous quarters and also above the general population.

1.4 Religion or belief

The Constabulary and support providers are not routinely capturing information on victims of crime and ASB's religion. The Lammy review identified this as important in order to ensure treatment and outcomes can be examined. The OPCC is committed to working with the Constabulary and providers to improve capture of equalities data.

Hate crime flags are being used more routinely within the Constabulary. These show where the victim's religion has been flagged by police or considered a factor in the crime perpetrated against them. Nationally, In 2016/17, there were 80,393 offences recorded by the police in which one or more hate crime strands were deemed to be a motivating factor. Of this figure, 5949 (7%) were faith hate crimes.

In 2016 there were 168 reports of faith motivated hate crime in Avon and Somerset and in 2017 that number rose to 232.³⁶ This steady annual increase may be attributable, in part, to improved recording, increased awareness of hate crime and confidence in the police. As with racially motivated incidents, it suggests a continued growth in reports and victims who may wish to receive support.

All services will be expected to meet the needs of victims with different religions or beliefs, ensuring that their service is accessible and able to meet their needs. In addition, the Enhanced Adult Support Service will continue to provide support for those who experience barriers or are targeted because of their religion or belief.

1.5 Gender

While women are less likely to be victims of violent crime in general, they are more likely to be victims of domestic abuse and sexual violence. The Crime Survey for England and Wales (CSEW) estimated that 26% of women aged 16 to 59 had experienced some form of domestic abuse since the age of 16, compared to 15% of men. While an estimated 3.1% of women (510,000) and

³⁶ *ibid*

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	<p>0.8% of men (138,000) aged 16 to 59 experienced sexual assault in the year ending March 2017³⁷.</p> <p>The 'postcode lottery' of provision of domestic abuse services across the force area was also cited in the stakeholder survey as a significant concern. Given the disproportionate impact of domestic abuse and sexual violence on women, any reduction or lack of support services in an area arena does disproportionately affect women.</p> <p>This Commissioning Plan does not include a specific provision for victims of domestic abuse as local authorities lead on the commissioning of specialist domestic abuse services in Avon and Somerset. In recognition of the issues facing domestic abuse services, a key question in the stakeholder survey during the engagement period was <i>'How can both OPCC- commissioned and specialist domestic abuse services / commissioners work together to best meet the needs of standard and medium risk victims of domestic abuse?'</i> Responses from partner agencies and co-commissioners echoed the OPCC's for greater join up between local services working in this arena but no easy solutions were offered.</p> <p>The Emotional and Practical Support Service, Enhanced Adult Support Service and the Children and Young People's Service will continue to support victims of domestic abuse where safe and appropriate working alongside specialist provision. In addition, the OPCC provides Local Authorities with a Police and Crime Grant and a number of areas use this to support their domestic abuse services.</p> <p>None of the services commissioned by the OPCC are gender-specific, but the specifications state they will provide a gender-sensitive service where relevant. By this, the OPCC expects providers to consider their client group and the needs linked to gender, so that adjustments such as female only spaces and choice of gender of worker for example are considered.</p> <p>The victim needs assessment identified support for male victims as commonly being unmet³⁸ and reports from current providers show that across services a higher number of women than men access support³⁹. The stakeholder survey also highlighted that services should be more accessible to male victims, who may find it more difficult to report sexual violence or domestic abuse and access help for example.</p> <p>The OPCC will work with providers during the mobilisation period after issue of contracts to ensure that all services are publicised, their remits clear and they are as accessible as possible for victims of any gender.</p>
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³⁷<https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/sexualoffencesinenglandandwales/yearendingmarch2017>

³⁸ Needs assessment <https://www.avonandsomerset-pcc.gov.uk/Partnerships/Victim-Services.aspx> pg. 17

³⁹ 2016 / 17 providers' data

1.6 Gender Identity

Questions on gender identity are not routinely asked of victims of crime in Avon and Somerset. Figures are however available where an incident has been flagged as a hate crime. This is where someone was targeted specifically due to their gender identity or perceived gender identity but does not account for transgender victims of other crimes.

Nationally, In 2016/17, there were 80,393 offences recorded by police in which one or more hate crime strands were deemed to be a motivating factor. Of this figure, 1,248 (2%) were transgender hate crimes. Avon and Somerset Constabulary records show there were 45 cases of transphobic hate crime reported in 2016.⁴⁰

There were no Transgender victims recorded as being supported by OPCC commissioned victim support services during 2016/17 and 1 in 2017/18. 2% of victims who responded to the victim survey did not identify with the gender they were given at birth but there was no specific feedback on how to make services more accessible. It must be acknowledged that more needs to be done to engage with people who are transgender, to help them feel confident in reporting crime and accessing support. This applies whether or not their gender identity was a motivating factor in the crime. The OPCC has an expectation that all providers will carry out targeted engagement with groups who face barriers in accessing support and reporting crime. Materials and practices should be culturally appropriate and inclusive. Staff will also have relevant equalities training.

However, the low numbers recorded may be a data capture issue if the Constabulary and support providers are not consistently including an appropriate question on gender in their equalities monitoring. Equally, where it is irrelevant to the crime and support offered a victim may chose not to disclose their gender identity as different to that given at birth. This can be addressed by seeking to improve monitoring within the force and across support services. The OPCC will seek to standardise capturing of equalities data and monitor specifically the success of initiatives to reach the transgender community.

All services will be expected to meet the needs of victims of any gender identity, ensuring that their service is accessible and able to meet their needs. In addition, the Enhanced Adult Support Service will provide support for those who experience barriers or are targeted because of their gender identity

More broadly, it should be noted that while not specialist hate crime services, due to the design principles, the Emotional and Practical Support Service, Enhanced adult support service the Children and Young people's service may all support victims of hate crime. In addition, there are a number of specialist hate crime services commissioned and funded by Local Authorities and others

⁴⁰ <https://www.avonandsomerset.police.uk/about-us/freedom-of-information/previous-foi-requests/hate-crime/transgender-hate-crimes-2013-2016/>

across the force area.

1.7 Sexual orientation

Consideration must be given to the fact that LGBTQ+ victims of crime are less likely to report a crime. A report by Stonewall states that four in five LGBT people (81 per cent) who experienced a hate crime or incident didn't report it to the police.⁴¹ The victim needs assessment carried out on behalf of the OPCC identified fear of not being understood and being 'outed' as a barrier to reporting a crime⁴². That would suggest that the 350⁴³ Avon and Somerset police cases recorded where homophobia was an element of the offence in 2016 is just a small proportion of actual victims in the force area.

An analysis of provider reports shows that those 350 victims are not represented in equality data reported by support services. As above, this may be due to data capturing. However, it must also be considered that the proposed services are not meeting the needs of the LGBTQ+ community.

While the proposed services include an Enhanced Adult Support Service for those vulnerable due to protected characteristics, which include sexual orientation, assertive effort must be made to ensure that the LGBTQ+ community are aware of and have confidence in the support available to them from **all** services. The OPCC will seek to standardise capturing of equalities data and monitor specifically the success of initiatives to reach the LGBTQ+ community.

All services will be expected to meet the needs of LGBT+ victims, ensuring that their service is accessible and able to meet their needs. In addition, the Enhanced Adult Support Service will provide support for those who experience barriers or are targeted because of their sexual orientation.

1.8 Spatial Inequality

There are practical considerations in reaching support if services are spread across a vast area. Public transport links are less comprehensive in rural areas and travel costs and time will factor into a victim's engagement with support. Also internet and mobile phone coverage can be less reliable in rural areas so will impact how victims can receive support such as online services or telephone support.

Stakeholder feedback emphasised widespread perception that rural areas are not receiving the same level of service. Conversely, there was also question raised about how rural based services could meet the needs of urban victims.

The OPCC accepts that the service providers' administrative base will not always be close to victims who need to access the service. However, the OPCC also recognises that a provider's administrative base does not necessarily

⁴¹ https://www.stonewall.org.uk/sites/default/files/lgbt_in_britain_hate_crime.pdf

⁴² <https://www.avonandsomerset-pcc.gov.uk/Partnerships/Victim-Services.aspx> pg. 22

⁴³ <https://www.avonandsomerset.police.uk/about-us/freedom-of-information/previous-foi-requests/hate-crime/homophobic-hate-crime-reports-since-2012/>

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	dictate the reach of its service. As such, accessibility to services will be a key part of specifications and tested through the procurement process. Providers will be encouraged to offer their services in ways to overcome these barriers such as: the use of video calling, colocation at community venues, workers holding a geographical portfolio for example.
2. Is the plan potentially unlawful (directly or indirectly discriminatory)?	There is no evidence to suggest that the Commissioning Plan is in anyway unlawful or discriminatory.

Stage 4- Consideration of Alternatives

Question	Answer
1. Please state the options you have considered to ensure the plan does not have an adverse impact on Equality Groups or reduce the adverse impact of the plan.	<p>The Commissioning Intentions and subsequent Commissioning Plan follow recommendations from the needs assessment: ‘given personal circumstances influence victims’ needs, the best practice is to focus on victims’ experiences with the incident instead of the type of incident’.</p> <p>The proposed model of support allows for an enhanced package of support in accordance with the Victims’ Code of Practice. Relevant to this assessment, this includes those victims who are persistently targeted and / or vulnerable.</p> <p>All services are open to those from the protected characteristics groups. There is additional specialist provision for children and young victims (Children’s and Young People’s Service) and those who require enhanced support due to their mental health, learning difficulties, physical disabilities, problems associated with isolation, race, religion, gender identity or sexuality (Enhanced Adult Support Service). It is felt this model of support meets the needs of members of equality groups whether or not their protected characteristics are a factor in the crime.</p> <p>Consideration should also be given to those who experience double discrimination due to being a member of more than one equalities group, i.e. a Black British young person may have different needs in a support service than a white British young person. This can be mitigated by having a range of services available and asking each individual victim of crime, which one would best suit their needs. This is undertaken via the Common Needs Assessment. There is also strong evidence of referrals between current services and joint working to support victims with multiple / complex needs.</p> <ul style="list-style-type: none"> • The OPCC will continue to foster this type of working environment through provider forums and networking opportunities. • Partnership working will be further promoted through the introduction of an annual prevention and early intervention fund which will be allocated to providers for collaborative working. <p>The OPCC is keen that not only these specialist services hold the responsibility for reaching and supporting victims of crime from equality groups. Each service should have the expertise to support all victims and their services</p>

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	<p>should be accessible to all. This will be promoted across all services.</p> <p>The OPCC will:</p> <ul style="list-style-type: none"> • Include a question in the tender process about how services will reach victims areas across the varied geographic area of Avon and Somerset. • Include a requirement that all service providers include in their bids an Equalities Statement showing how they ensure their service is inclusive and meets the needs of the communities they serve, to promote awareness and encourage all services to have equitable access to services in mind. • Include a requirement that staff received equality and diversity training in the service specifications. • Ask bidders to provide information on how they will reach equality groups to encourage reporting and access to support agencies. • Request that initial assessments include a question around disability and what adjustments are required so that a victim is more able to access support. • Specify that delivery of services is sensitive to the needs of clients and aware of the impact that trauma can have. • Facilitate shared learning and good practice between all OPCC commissioned services. • Specify that all providers have a website and promotional activity to raise awareness of the available services. Materials and practices should be culturally appropriate and inclusive. • Work with Lighthouse to refresh their directory of support services so that victims of crime can see what is available and make an informed choice on where they access support. • Specify that all services are accessible to all genders and be delivered in a gender sensitive way. <p>So that the effectiveness of this plan and how equality groups access support can be monitored, The OPCC commits to work towards an Improvement in equalities data monitoring within the force and across all services.</p>
<p>2. Please state your sound reasons for amending or not amending the plan at this stage.</p>	<p>The current intentions do not adversely impact equality groups. We believe that the required emphasis can be made within service specifications and during the tender process to ensure the commissioning of services go further to advance equality of opportunity to access services, encourage reporting of crime and build resilience across all communities.</p>

Stage 5- Consultation on the decision relating to EIA

Question	Answer
<p>1. Who have you consulted with in the preparation of this plan and what did you consult on?</p>	<p>The OPCC has engaged with a range of stakeholders and interested parties to receive feedback on the Commissioning Intentions to aid the development of the Commissioning Plan:</p> <p>1 Direct engagement with victims of crime was carried out by Tonic. This work has intentionally targeted groups with protected</p>

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	<p>characteristics through community groups and forums. The victim survey includes a series of questions to capture equalities data. This allowed us to ensure the opportunity to feedback on the commissioning intentions has reached hard-to-reach groups and their views are taken into consideration. The tender process for engaging an external company for this work included a question on how they would make the process as accessible as possible. Tonic offered telephone interviews and workshops as well as a survey that was available online, in paper and in an easy read format.</p> <ol style="list-style-type: none"> 2 Current providers have been given opportunity to feed into the OPCC directly via contract review meetings and existing forums. 3 Potential providers have been sent the stakeholder survey and invited to engagement events organised by VCSE partners. 4 Wider stakeholders including those representing equality and community groups have been invited to take part in the stakeholder survey. 5 Other commissioners and statutory boards and groups have been briefed and invited to take part in the survey.
<p>2. Please state the results of the consultation?</p>	<p>The Commissioning Plan sets of the key changes that have arisen from the engagement period:</p> <ol style="list-style-type: none"> 1. Annual grant to Unseen UK for the Modern Slavery Service – given the size of the existing grant, the local specialism required and the flexibility required to develop the local provision around the National Referral Mechanism (NRM) offer a business case is being prepared to allow for the OPCC to continue with the existing annual grant agreement which was awarded following a competitive process in 2015. 2. Design of the procurement timeline and process in line with feedback for example: <ul style="list-style-type: none"> - 7 week submission window for tenders - Contract award before the end of December 2018 - Interview/presentation as part of evaluation 3. Specifications will be drafted to take into account specific points of feedback. 4. The titles of some of the services have been changed slightly to recognise the scope of the service (no significant changes to the overall service). <ul style="list-style-type: none"> ○ The significant practical support offered as part of Lot 1 ○ The enhanced nature of support offered as lot 2 ○ The age ranges to be supported by lot 3. 5. While out of scope for recommissioning, the feedback received for the Lighthouse service throughout this process will be used to inform a work plan to consider and address key points raised.

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Stage 6- Decision by Policy Owner

Question	Answer
1. Please state whether you accepted, amended or rejected the plan as result of the EIA process?	This EIA has helped shape the OPCC's Commissioning Plan. The Plan has been agreed by the Victim Services Recommissioning Governance Board and published as an annexe to the Commissioning Plan July 2018.

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Annexe D - OPCC response to the Victims Needs Assessment Recommendations.	
The full Needs Assessment which was published in March 2018 can be found on the PCC's website here	
Recommendation	Response
1. OPCC commissioned service providers and the OPCC should recognise and celebrate their achievement in developing good services for victims in Avon & Somerset	It is positive to receive feedback at the achievement in developing current services for victims in Avon and Somerset. The OPCC will continue to work with providers to promote services for victims and the impact that they have. We will continue to develop mechanisms through the Providers Forum and Local Criminal Justice Board for example to celebrate and share good practice.
Meeting Changing Needs	
2. Services need to be supported by the OPCC to retain the ability to be flexible and adapt to meet the increasing and changing demands of service users observed both locally and nationally.	The PCC continues to work with the Constabulary and local partners to make the case for fair and sustainable funding in response to changing demand, an increase in complex and high harm cases and increased focus on supporting vulnerable people. The PCC has protected funding for commissioned victim services in a context of increasing financial pressure. The OPCC will continue to work closely with providers through contract management arrangements and encourage strong partnership working through the Providers Forum in order to ensure services remain flexible to be able to adapt to changing need. A new 'Prevention and Early Intervention' pot of funding will be made available to commissioned services to encourage innovation and development of new ways of working to respond to changing need.
3. Consider where there are opportunities for joint commissioning across Avon and Somerset or other ways in which OPCC commissioners can work more closely with other commissioners to ensure that there is a more consistent level of service and that resources are used efficiently.	The OPCC continues to work closely with local commissioners to identify opportunities for joint commissioning, recognise the that commissioned victim services operate within a wider landscape of support services, and encourage partners to work together to ensure a consistent level of service and efficient use of resources. Local commissioners were invited to meet with the OPCC team during the engagement period, and the OPCC continues to work with local authority, community safety, health and other specialist commissioners to develop commissioning proposals in the context of the wider landscape. This includes participating in joint commissioning opportunities as appropriate, and contributing to opportunities to influence changes at a national level.
4. The re-commissioning process provides a good opportunity for services to review their accessibility and plan improvements	Issues raised with respect to accessibility of services have been fed into the Equality Impact Assessment, prepared to inform development of the commissioning plan and service specifications. Accessibility will also be considered as part of the procurement

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	process, with providers encouraged to design their services in ways to overcome barriers identified.
Partnership and Integrated Working	
5. Review how working practices across OPCC commissioned services could be improved to reduce the need for victims to retell their story.	The model set out in the commissioning plan that has been in place since 2015 was designed to streamline the victim's journey through the criminal justice service and to coordinate services in accordance with need. The Lighthouse Victim Care service acts as the core point of contact for victims going through the criminal justice system, and makes onward referrals in response to identified need, sharing information as appropriate. The OPCC continues, through the Providers Forum and other mechanisms, to encourage providers to collaborate to ensure effective ways of working, understand roles and responsibilities, and raise awareness of services available to victims and referral pathways.
6. Consider where there are further opportunities for co-location of services or secondments.	Effective partnership working between services is encouraged and fostered through the Provider Forum and other mechanisms. This includes co-location of services where appropriate. The new Prevention and Early Intervention Fund will be made available to commissioned services to encourage greater collaboration and innovative approaches to reduce victimisation.
7. Review Lighthouse procedures for clearing referrals in order to help services manage and respond to their referrals in a timely manner.	The OPCC has raised this specific issue and is satisfied that this does not reflect working practices within the Lighthouse service. Arrangements are in place, including weekend working rotas, to ensure timely onward referral so that victims are able to access appropriate support services in response to need. The OPCC continues to encourage feedback on all victim services to inform continuous improvement of services, and in order to raise specific issues with service providers as required.
8. Consider the benefits of promoting shared definitions of vulnerability and safeguarding across the services.	<p>The OPCC understands the request for a concise cross-agency definition of 'vulnerability', but recognises the challenges involved in achieving this. This is due to the number of partners who work to different interpretations of the term 'vulnerability' informed by their commissioners, demands on service and thresholds.</p> <p>As a guide, providers can refer to Avon and Somerset Constabulary's definition of 'a vulnerable person' taken from the College of Policing and the VCoP: 'Anyone who has been or is believed to be at risk of harm, abuse or exploitation following consideration of their individual circumstances and who is or may be in need of support or intervention'</p>

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	<p>And/Or</p> <p>Any victim of crime who is entitled to an ‘enhanced service’ in accordance with VCOP’</p> <p>Vulnerable victims</p> <ul style="list-style-type: none"> • All victims who are under 18 years of age at the time of the offence Or, the quality of their evidence is likely to be affected because they: <ul style="list-style-type: none"> • suffer from mental disorder within the meaning of the Mental Health Act 1983 • have a significant impairment of intelligence and social functioning • have a physical disability or is suffering from a physical disorder <p>Intimidated victims</p> <ul style="list-style-type: none"> • The quality of the Victims evidence may be affected because of fear or distress about testifying in court. <p>Persistently targeted victims</p> <ul style="list-style-type: none"> • A victim who’s been repeatedly targeted as a direct victim of crime over a period of time; <p>The OPCC will also support the constabulary’s implementation of the BRAG assessment tool which will assist police officers to ascertain level of vulnerability and guide on next steps are required.</p>
<p>Raising Awareness of Victim Services</p>	
<p>9. Ensure that partners are aware of the role of Lighthouse.</p>	<p>The recommissioning process provides a timely opportunity to refresh and update the Lighthouse website and associated publicity materials to ensure that partners are aware of and understand the role of Lighthouse, commissioned services and referral pathways. The OPCC will work with the Constabulary to ensure internal communications are put in place and with partners to identify opportunities to raise awareness of the role of Lighthouse and referral partners with wider partnerships and organisations.</p>
<p>10. Consider how the knowledge of frontline police officers can be raised so they have a clear understanding of the system – both when to refer to Lighthouse and where to signpost/refer those who are not eligible for a Lighthouse</p>	<p>As stated above, the OPCC will continue to work with the Constabulary to ensure internal communications are put in place to raise awareness and understanding of the role of Lighthouse and referral pathways. This includes supporting development of content for Pocketbook (an online tool to guide and support decision making), training</p>

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referral.	packages and briefing opportunities.
11. Continue to support the Restorative Justice Service to raise its profile in the local area.	The OPCC will continue to support the Restorative Justice Service to raise its profile alongside work to refresh the Lighthouse website, communication and training opportunities and efforts to raise awareness of victim services and referral pathway. Through the Providers Forum, the OPCC will continue to encourage strong and effective partnership working between the Restorative Justice service and wider victim services. The OPCC will continue to scrutinise whether restorative justice has been offered to victims as part of ongoing work to support compliance with the Victims Code of Practice. The need to consider restorative justice and have pathways in place will be a requirement for all commissioned services.
12. Findings from the (planned OPCC) mapping exercise should be used to develop the Lighthouse directory of services, and awareness of this resource should be raised amongst practitioners and public.	As stated above, the OPCC recognise that the recommissioning process provides a timely opportunity to refresh and update the Lighthouse directory of services, and take forward work to promote awareness and understanding of services available to victims and referral pathways. This includes specific work to raise awareness of the Lighthouse website as a tool to enable self-referral by those who do not wish to report to the police, in accordance with requirements of the EU directive.
13. The positive feedback provided by victims should be used appropriately in publicity to share experiences and encourage engagement.	The OPCC will continue to encourage Providers to share, with the consent of victims, positive feedback on their experiences through the Local Criminal Justice Board to inform development of good practice, and through media and awareness-raising opportunities to increase confidence that victims will be taken seriously and given the support that they need.
Addressing Gaps in Service Provision and Reaching Victims	
14. Consider how the needs of victims who do not meet criteria for enhanced service, or (in the case of domestic abuse) are assessed as low-medium risk can be met.	The Lighthouse service is designed to undertake a comprehensive needs assessment and onward referral, including to those services that sit outside the commissioned services where thresholds may not be met. In addition, the Emotional Support service is open to all victims who wish to receive its service. With regard to services for victims of domestic abuse, the OPCC invited all domestic abuse commissioners to participate in the engagement period and asked a specific question about this issue in the stakeholder survey. The OPCC continues to support local commissioning of specialist domestic abuse services some of which have been funded through the Police and Crime Grant (at the decision of the Local Authority who allocate funding to meet local priorities). The OPCC will continue to work with local commissioners to support efforts to improve consistency of service and access to support for victims assessed as

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	standard-medium risk.
15. The OPCC should consider targeted work to address specific barriers to access identified by the stakeholder consultation.	As stated above, issues raised with respect to accessibility of services have been fed into the Equality Impact Assessment, prepared to inform development of the commissioning plan and service specifications. Specific work to engage with victims (including those who did not access services) was commissioned as part of the engagement process to explore and enhance feedback in relation to accessibility of services. Accessibility will be considered as part of the procurement process, with providers encouraged to design their services in ways to overcome barriers identified.
16. The results of the stakeholder consultation should be used to consider where further work can be carried out to engage with victims who do not typically engage with support services.	As set out above, the OPCC commissioned Tonic Consultancy to carry out work to engage with victims who have not engaged with services. Feedback has been used to inform development of the Equality Impact Assessment, commissioning plan and service specifications.
17. Consider how greater access to services providing specialist emotional support services (such as therapy) to victims of crime can be facilitated.	Specialist therapeutic support services are out of scope of this commissioning process as set out in the Commissioning Intentions. However, the OPCC continues to work with NHS England and Clinical Commissioning Groups to support development of the wider landscape of services that victims may need to access and raise awareness of referral pathways, including self-referral opportunities such as Improving Access to Psychological Therapies services (IAPT).
18. Consider how self-help groups and befriending services can best be developed in Avon and Somerset.	The OPCC has designed its Commissioning Plan in recognition that commissioned services are one part of a wide and varied landscape of support that victims may need to access in response to their needs. This includes local services such as befriending services for vulnerable or older people, and self-help groups that can help to build personal resilience. The opportunity to refresh and update the Lighthouse directory of services provides an opportunity to identify and establish links with local groups and make best use of existing resources. The OPCC will continue to encourage commissioned services to consider innovative approaches to service design, of which self-help and befriending may be one such model where appropriate.
19. Consider how greater access to mental health services for victims of crime can be facilitated.	Access to services for people experiencing mental distress was considered as part of the Equality Impact Assessment, developed to inform the commissioning plan and service specification. Work commissioned by Tonic Consultancy to engage with victims has continued to explore and provide feedback in relation to barriers to services. The OPCC continues to work with partners to ensure access to appropriate support for vulnerable people, including those with mental health needs. There are

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	opportunities for the Provider Forum to work together to develop a trauma-informed approach, drawing for example learning and expertise through ongoing work led by the Reducing Reoffending Board.
20. Review whether joint commissioning of domestic abuse services across the area could result in a more consistent level of service.	As stated above, the OPCC invited all domestic abuse commissioners to participate in the engagement period. The OPCC continues to support and values the local commissioning of specialist domestic abuse services some of which have been funded through the Police and Crime Grant (at the decision of the Local Authority who allocate funding to meet local priorities). The OPCC will continue to work with local commissioners to support efforts to improve consistency of service and access to support for victims of domestic abuse.
Improving Victims' Experiences of the CJS	
21. Consider how feedback from victims and service providers can be used to inform improvements to the practice of agencies involved in CJS in regards to victim care.	The OPCC is currently working with criminal justice agencies to develop a single survey to capture the experience of victims at every point through their journey through the criminal justice service. Building on existing good practice in place with the ISVA Victim Survey, there is an opportunity to coordinate survey and feedback opportunities to ensure that the voice of the victim is heard, and develop robust mechanisms to ensure that feedback is used to inform continuous improvement of services for victims through the Local Criminal Justice Board and other mechanisms.
22. Supporting victims through the CJS is a crucial element of victim support work. Consideration should be given to whether the work of IDVAs and ISVAs can be expanded and whether this model can be applied to other crime types.	The OPCC continues to support opportunities to improve the experience of victims, including the experience at court. The OPCC will continue to encourage coordination of services and learning from good practice through the Provider Forum and other mechanisms. The OPCC is also taking forward work to improve the experience of victims at court with the Court Witness Service, through their involvement in the PCC's Criminal Justice Transformation Project, and in identifying emerging opportunities through national proposals for the future of the service.
23. Review the findings from the stakeholder consultation to identify where OPCC resources might be best targeted to reduce barriers to reporting.	Barriers to reporting have been considered within the Equality Impact Assessment and in work commissioned from Tonic Consultancy to engage with victims. The OPCC will continue to review detailed findings and work with providers to identify opportunities to raise awareness and confidence to report through efforts to promote services and, refresh the Lighthouse directory of services website to ensure that it is up to date and fit for purpose to support self-referral and address barriers to reporting.
24. Empower victims to choose whether they would like to	As stated above, the OPCC will ensure that work is carried out to refresh the

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<p>report. Victims must be given realistic expectations about the likely outcomes of CJS involvement.</p>	<p>Lighthouse directory of services website to ensure that it is up to date and fit for purpose to support self-referral and address barriers to reporting. In relation to setting realistic expectations about the likely outcomes of CJS involvement, keeping victims informed and managing expectations is a key theme through work underway under the PCC's Criminal Justice Transformation Project.</p>
<p>Adopting Best Practice</p>	
<p>25. Continue to foster working environments where best practice can be achieved. As far as possible a focus should be retained on achieving procedural justice for victims, adopting a multi-agency approach, professionalising services and enabling clear communication with victims.</p>	<p>The OPCC continues to support strong and effective partnership working between service providers to achieve procedural justice, and adopt ways of working to ensure the best outcome for victims. The 'four pillars' set out in the commissioning intentions, plan and service specifications gives a clear statement of the expectation set on service providers and will continue to guide the focus of contract management arrangements, scrutiny work and the agenda for the Provider Forum.</p>
<p>Developing Practice</p>	
<p>26. Establish a protocol for OPCC commissioned services to gather victim's feedback on barriers or issues they face as a victim and how these can be shared amongst services.</p>	<p>As stated above, the OPCC is currently working with criminal justice agencies to develop a single survey to capture the experience of victims at every point through their journey through the criminal justice service. Building on existing good practice in place with the ISVA Victim Survey, there is an opportunity to coordinate survey and feedback opportunities to ensure that the voice of the victim is heard, and develop robust mechanisms to ensure that feedback is used to inform continuous improvement of services for victims through the Local Criminal Justice Board and other mechanisms.</p>
<p>27. Consult with and use the expertise of well-placed practitioners to develop practice. Many interviewees highlighted areas where they could develop their own work or support other services, which would be worthy of further consideration.</p>	<p>The OPCC will continue to support sharing of good practice and development of services through the Providers Forum and other mechanisms. Availability of the new Prevention and Early Intervention Fund is intended to support commissioned services in working together on sharing and development of good practice and innovation to reduce victimisation.</p>