

**Rt Hon Alun Michael JP OStJ FRSA**

Comisiynydd yr Heddlu a Throseddu De Cymru  
Police and Crime Commissioner for South Wales



8 February 2021

**POLICE & CRIME COMMISSIONER RESPONSE TO THE HMICFRS / COLLEGE OF POLICING / IOPC REPORT: 'SAFE TO SHARE? REPORT ON LIBERTY AND SOUTHALL BLACK SISTERS' SUPER-COMPLAINT ON POLICING AND IMMIGRATION STATUS'**

This report concerns the practice of police sharing of victims' information with the Home Office. It concludes that the current system is causing harm to the public interest and makes recommendations to work to ensure victims of crime are always treated as victims, first and foremost, regardless of immigration status.

I welcome the report and, as always, welcome recommendations that focus on improving the treatment of victims. I am pleased to see that recommendations have been made for a number of bodies, including the Home Office.

The Chief Constable and I, recognise that the impact on victims and their families, of modern slavery, human trafficking and domestic abuse offences is truly devastating. As such, robustly tackling such serious criminality, coupled with effective safeguarding of those most vulnerable, is embedded in daily policing and remains a priority within my own Police & Crime Plan, and in the Chief's Plan and strategic vision. Victim focus is at the centre of our response, and, by working closely with external partners, South Wales Police seeks to ensure that all avenues to meet the safeguarding and support needs of individual victims are explored.

We recognise that, often due to their particular circumstances and the coercive controlling influence of the perpetrator(s), it can be extremely difficult for victims to report these type of offences to the police. We understand that this reporting inertia is intensified in cases where victims fear that aspects of their immigration status may in itself result in negative outcomes, and that this can effectively present a barrier to their engagement with police. South Wales Police is committed to ensuring that, regardless of immigration status, all victims of crime are afforded the standard of service and entitlements that are defined within the national Code of Practice for Victims of Crime.

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Mae'r Comisiynydd a'i dîm yn croesawu gohebiaeth yn Gymraeg neu Saesneg  
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Within my team I have a Strategic Lead for Victims & Vulnerability, and she works diligently with partner agencies to ensure victim care is embedded in our work and remains a priority in South Wales Police. The Welsh Refugee Council is also a member of my Police Accountability & Legitimacy Group, which enables a voice for refugees to be included in my oversight and scrutiny work.

Building upon the foundational, and excellent, work achieved as a result of the Early Action Together Programme, the newly established South Wales Police Vulnerability Programme is enabling the Chief Constable and I to commit to further embedding exceptional and consistent victim focus. The parameters of the programme include those who are victims of the offences that provide the HMICFRS report's subject matter, and is cognisant of the particular needs of those victims with insecure immigration status.

In response to the HMICFRS report, the Chief Constable point out the following examples of work undertaken, or in the process of being implemented, to highlight this commitment:

- *South Wales Police is fully aware of the need to ensure that its officers and staff are provided with clear and unambiguous guidance as to prioritising safeguarding victims and immigration enforcement. In order to ensure we promote consistency in approach, a bespoke app, designed by a South Wales Police officer who had been seconded to the International Crime Coordination Centre, has been installed on all mobile handheld devices. The app delivers clear and unambiguous guidance for all operational officers and staff dealing with such offences and states explicitly that "If you are dealing with a victim/witness who may be an immigration offender, the priority should be to treat them as a victim/witness".*
- *In the recent HMICFRS report, the relationship between North Wales Police and Black Association of Women Step Out (BAWSO) was highlighted as an example of good practice. While South Wales Police recognises and applauds this, it is important to emphasise that South Wales Police also enjoys a strong relationship with BAWSO. Evidence of that close partnership can be seen in the joint funding of a regional Human Trafficking MARAC Coordinator, seconded from BAWSO, and an experienced Independent Domestic Violence Advocate (IDVA), and outreach worker, to work within the Public Protection Department. The wider perspective enabled by this arrangement ensures that*

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*the diverse needs of victims are understood and that a holistic approach is taken to safeguarding directed at the needs of the individual. This includes ensuring that the individual is signposted to the most appropriate support agencies and that immigration itself is recognised as a risk factor.*

- *The recent creation of a post within the Force Intelligence Bureau provides a central oversight of, and consistency in, all South Wales Police investigations. It also provides a single point of contact where officers can obtain specific and general advice regarding Modern Slavery.*
- *In relation to Information Exchange regarding Victims of Crime with No Leave to Remain, South Wales Police works within the framework of the 2018 National Police Chiefs' Council guidance (as amended 2020). However, we welcome the fact that the report offers an opportunity to scrutinise our current processes in light of its findings and recommendations and learn from examples of good practice of our peers and partners in other force areas.*

The Chief Constable sums up his response to the report as below:

*'South Wales Police welcomes the report and will ensure that its recommendations and findings are reviewed and that, if not already embedded in our daily policing, are incorporated into the provision of an excellent, victim focused service for victims of modern slavery, human trafficking and domestic violence. In particular, we will continue to provide reassurance to the vulnerable in our communities that insecure immigration status should not be seen as a barrier to seeking the protection and support of the police.'*

As Commissioner I continue to fund South Wales Victim Focus in our force area, which prioritises victim support for the most vulnerable in our communities. This is another example of a successful partnership arrangement that promotes my own commitment, and the Chief Constable's commitment, to holistic safeguarding and support for victims. I am grateful for the Chief's comments on this report and feel assured that the commitment to safeguarding people with immigration status is increasingly understood in South Wales Police. That said, I welcome the recommendations for policing and all bodies referenced in the report, and the further safeguarding opportunities they will present.

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