

**BEV HUGHES**  
**DEPUTY MAYOR**  
**OF GREATER**  
**MANCHESTER**

Rt Hon Priti Patel,  
Secretary of State for the Home Department  
2 Marsham Street  
London  
SW1P 4DF

April 2022

Dear Home Secretary

**SUBJECT: A joint thematic inspection of the police and Crown Prosecution Service's (CPS) response to rape Phase two: post-Charge.**

I write in response to the recent joint thematic inspection of the police and Crown Prosecution Service's (CPS) response to rape. I understand this is the second and final phase of the inspection, looking at cases from the point of charge through to their conclusion and includes those which were decided in court.

I welcome this comprehensive inspection. The need to improve the criminal justice system response to rape, maintain a focus on the victim at all times and increase the numbers of people prosecuted is paramount.

The report highlights some concerns regarding the police and CPS's management of cases, including disclosure errors, failures to consider the use of bad character for evidence against suspects; and failures to apply for all the protective civil orders available. It also highlights poor communication between the police, CPS, other criminal justice agencies, victims and the services supporting those victims. I have noted the findings of the report and have already raised these with Chief Officers locally.

The report makes a number of recommendations for policing. I shall respond to these in turn below:

***Recommendation 1 - Immediately, police and prosecutors should review and significantly improve communications with victims from the point of charge onwards.***

I recognise that not only is this a key recommendation from this review, but that it is also a consistent cause of frustration, dissatisfaction, and distress to victims. I have commissioned an extensive 12-month victim survey and I will be expecting the findings from the survey to feed into performance

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appropriate frameworks and service redesign. In Greater Manchester critical communication issues have been identified from a number of sources such as our victim survey results; complaints received to the Greater Manchester Combined Authority (GMCA) and Greater Manchester Police (GMP); and from GMP's review of cases where victims have disengaged from the criminal justice process. The Chief Constable and I know this is an area which requires significant improvement, and we are committed to this.

In September 2021, GMP published an overarching strategic improvement plan set out as a Plan on a Page, which distilled their strategic approach into a clear plan, with the following purpose: Focus on the basics, Fight, prevent and reduce crime, Keep people safe and Care for victims.

GMP is using the Plan on a Page as a vehicle to improve how they interact with victims and communities. This is now the subject of increased focus at Chief Officer level, and through increasing the accountability of district commanders in their response to victims. There has also been a schedule of training completed under the Think Victim Programme to enhance GMP's communications with victims, with the Victim's Code of Practice (VCOP) at the heart of this. A newly appointed Assistant Chief Constable will take responsibility for ensuring improvements with VCOP, including the identification of good practice.

The in-progress Greater Manchester Victim Services Review will further enhance the communications GMP has with victims and includes the ambition to deliver a more cohesive service. The review wants to embed closer collaboration across GMP, victim services and other commissioned community providers as part of a whole system approach, to better support and serve victims.

The impact of this work can only be monitored by seeking the views of victims. GMP will continue to utilise satisfaction surveys and to review the outcomes and feedback. In addition, scrutiny panels, independent advisory and critical friend networks will be used to seek further feedback and insights from those with lived experience. In my role as Deputy Mayor I will be holding the Chief Constable to account on GMP's response to and communications with victims.

Finally, in Greater Manchester we have a joint ambition to develop Witness Centres with our sexual violence victim support services to enable the taking of ABE statements in a sensitive and confidential environment and ultimately improving communication links for the reporting, investigation and prosecution of rape and serious sexual offences.

***Recommendation 2 – Immediately, the police and the CPS should work collaboratively to ensure that bad character is considered in all rape cases and progressed wherever it is applicable.***

I understand that this recommendation is already an established commitment between GMP and CPS Northwest (NW) Rape and Serious Sexual Offences (RASSO) Unit. It is expected that the Joint Rape Service Delivery Board, co-chaired by the GMP's Head of Public Protection, will enable the regular production and scrutiny of data.

The Criminal Justice Hubs in GMP have been tasked with improving the quality of files being submitted to the CPS. I am aware that the national file standard provides for a staged and proportionate approach to the preparation of case files and that evidence of bad character is considered a key element of the national file standards. Investigating officers for all rape cases in GMP are trained in, and understand, their responsibilities to comply with these standards. This is further reinforced through a series of governance checkpoints to ensure that files are complete and meet the requirement ahead of submission to the CPS.

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I think there is much more to be understood and developed regarding criminal justice agencies taking a suspect focused approach and reducing unnecessary intrusion in victims lives. Through the Justice and Rehabilitation Executive which I chair and to which the LCJB reports to I will ensure the new 'Joint Outcomes and Improvement' governance arrangements between Greater Manchester and the CPS are in place and being used effectively to drive changes in practice and culture.

***Recommendation 3 - Immediately, forces should make sure that victims of rape are given the opportunity to make a victim personal statement (VPS) at the earliest possible time, with the option of updating this statement closer to the court trial date.***

Providing the opportunity for a victim to provide a personal statement is crucial. It is their opportunity to outline how the crime has impacted them and to give them a meaningful voice through prosecution proceedings.

GMP's existing policies and processes stipulate that at the point a criminal offence is identified, and the victim makes a statement, the officer in charge of the case will offer the victim the option to make a victim personal statement. It is recognised that at the early stages of an investigation victims may not wish to make such a statement, therefore, subsequent opportunities are made available to the victim before charge, at the point of charge, and before the court case. This will be under review by the CPS case worker, investigating officer and witness care units, to ensure that every opportunity is given to victims to provide one.

As mentioned previously, I intend to ensure via the Victim Services Review that support services are more closely engaged in criminal justice processes to inform victims of their rights and advocate on behalf of victims to ensure their voices are heard.

I would like to make a final general point which impacts across the three Recommendations. I have instigated a RASSO End-to-End Review in Greater Manchester which is focusing on reporting, investigation and prosecution and the effectiveness of the current delivery. It will result in the identification and implementation of a delivery plan to improve the services delivered by statutory and voluntary-sector partners in Greater Manchester throughout the victim journey. The review will have a focus on identifying and recognising outcomes that are important to victims and witnesses. There are five Pillars of the review which are: Suspect Focus; Victim Care and Support; Workforce; System and; Resource Management.

This tripartite review is jointly led by GMCA, GMP and the CPS. I will share findings and progress made against the review with key partners and stakeholders throughout the various stages and this is a clear public commitment to not just narrowing the justice gap for rape and serious sexual offences, but also improving the quality of service to victims.

Yours sincerely



**Baroness Beverley Hughes**  
**Deputy Mayor of Greater Manchester**  
**Policing, Crime and Criminal Justice**

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