NCVPP

National Centre for Violence Against Women & Girls and Public Protection

Frequently Asked Questions

Practice Advice to Support the Writing of Individual Management Reviews





Purpose and remit of the practice advice

Is this official guidance from the College?

This resource does not constitute official guidance issued by the College of Policing. The Vulnerability Knowledge & Practice Programme (VKPP) operate within the National Centre for VAWG and Public Protection (NCVPP) which is hosted by the College. This document has been developed by the VKPP Reviews Team in order to support individual management review (IMR) authors to produce high-quality reviews. However, it does not replace guidance from statutory review authors and chairs. Forces are asked to use this document to support them in writing IMRs, but the use of this practice advice will not be mandated.

Are there plans to develop a national template for individual management reviews that will be adopted by all forces?

We are conscious that there are a number of different templates provided by statutory review authors and chairs, and that some forces are beginning to adopt standardised IMR templates. As part of developing this practice advice we have also heard reflections from individuals concerning the value of a standardised, national template for IMRs.

We are not aware of any plans at present to develop a national template, however this document has been designed so that it can be used flexibly across a range of different templates.

What is the purpose of each of the documents? How do you see them being used by forces?

The "Practice Advice to Support the Writing of Individual Management Reviews" document provides a detailed overview of the findings from our work analysing police IMRs and gives a deeper insight into what 'good' looks like for these reviews. Alongside this, two summary documents have been developed, one for review officers and one for review leads. Each document summarises the checklists from the full practice advice, reflecting the responsibilities within each respective role.

We recognise that practitioners have many demands on their time. We would therefore recommend that individuals read the longer document initially, and then use the summary documents and checklists to assist them within their daily role.

Does the practice advice seek to address wider issues within the reviews system, in terms of implementing recommendations and getting this learning back into the system?

We acknowledge the challenges faced by IMR authors in this regard and the challenges within the wider reviews system in terms of implementing recommendations and ensuring the learning identified within reviews gets back into the system. The purpose and focus of our work has been to develop a resource to enhance the quality of IMRs, including ensuring that the learning and recommendations within IMRs are clearly defined.

The implementation of learning and recommendations from IMRs and statutory reviews continues to be a key focus for the team. We are presently engaging in future workstream activity to further explore and address this issue.

Protected characteristics and intersectionality

Is it lawful and appropriate to report gender reassignment within individual management reviews?

We are aware that there can be concerns around disclosing sensitive information, particularly surrounding gender identity, within reviews. However, reporting this information, where it is known, is crucial in developing our understanding of the risks experienced by different groups. Understanding this risk is important in improving outcomes for marginalised and vulnerable populations.

We have spent some time reviewing the relevant legislation and have consulted with the Data Protection team within the College of Policing for further guidance.

Ultimately, there must be a lawful basis for processing information. Information regarding gender reassignment would often, although not always, be classified as special category data and would require a further condition for processing under Article 9 UK GDPR. There are several exemptions which may allow for this information to be legally reported:

- Although this information should of course always be handled with care and respect, it would no longer be considered personal data subject to UK GDPR if the individual is deceased.
- Article 6(1)(e) of UK GDPR sets out a lawful basis for processing where the task is in the public
 interest which is laid down by law; or if you are exercising official authority which is laid down by
 law.
- Section 22 of the Gender Recognition Act 2004 defines "protected information" relating
 to a person who has made an application for a gender recognition certificate. It creates a
 criminal offence of disclosing protected information acquired in an official capacity. There
 are exemptions to the offence under this section, such as where disclosure is for the purpose
 of preventing or investigating crime, or if the information does not enable that person to be
 identified. Please see here for the full list of exemptions.

As advised in the practice advice, please consult your own data protection or legal team for further support around the appropriate inclusion of information regarding gender reassignment within IMRs.

Do review officers have the necessary knowledge and training to be able to address intersectionality within their reviews?

Our conversations with review officers have demonstrated that the term 'intersectionality' is not consistently used and understood across forces. However, there was agreement among review officers/leads and statutory review authors in our focus groups and consultations about the value of including this information within IMRs.

We recognise that IMR authors will be at different stages in terms of how confident they feel in addressing intersectionality within reviews. We hope that the practice advice provides some key prompts to encourage review officers to do this, and we have included some resources to support review authors in this area. We are aware that data related to intersectionality may often be limited or not available, however, we encourage review officers to include information where possible, and to be transparent about where it is not known.

Can any practical examples be provided to support review officers to feel more confident to discuss intersectionality within reviews?

We reviewed a number of statutory reviews and IMRs and have been unable to identify a review which explored intersectionality in any significant depth, or in a particularly meaningful way. We acknowledge that there is a gap in this area, as identified in the recent briefing from the Child Safeguarding Practice Review Panel¹. There have also been recent calls from various bodies, including the Domestic Abuse Commissioner and Advocacy After Fatal Domestic Abuse, for a greater consideration of intersectionality to be included in statutory guidance underpinning DHRs.

Within the practice advice document, we provide a definition of intersectionality (Crenshaw, 1989) and also propose a number of questions and prompts for review officers to reflect on, to support them to consider intersectionality within the review.

The below resources may be further helpful in supporting review officers to understand more about intersectionality, and how this can be explored and considered within reviews:

- <u>This page</u> from Research in Practice provides a definition of intersectionality, and provides guidance on understanding intersectionality, including reflections from individuals with lived experience.
- The <u>Intersectionality Wheel</u> may also be a helpful visual tool to encourage review officers to consider the different contexts and social identities that influences an individual's lived experiences.
- Annex F within this recent report published by the Child Safeguarding Practice Review Panel provides an equity, equality, diversity and inclusion framework which may be valuable in encouraging you to consider how these issues are considered and addressed within reviews.

Addressing the 'why'

How do review officers address the 'why' if it is not known?

We acknowledge that 'why' the incident occurred may not always be known to the IMR author and that there can be internal and external challenges to exploring this within reviews. However, IMRs provide a crucial opportunity to critically evaluate practice. We would encourage officers and leads to use the IMR as an opportunity to consider the individual, organisational, and wider contexts that influenced decision making, to the fullest extent possible. The practice advice provides prompts and assistance to support review officers in this area.

How the practice advice was developed

How have you engaged with statutory review authors/chairs as part of this work? Will they be aware of this practice advice?

We have engaged in consultations with a small number of statutory review authors and chairs with experience of DHRs, LCSPRs, and SARs. Their feedback was incorporated into the practice advice before further review by police review officers and leads. We intend to share the documents widely among statutory review networks where possible.

Have you sought feedback from police review officers and leads on these documents? How have their views informed the development of these resources?

Yes. It is of paramount importance to us that these resources are meaningful and valuable to individuals writing police IMRs. To that end, we have engaged with police review officers at all stages of developing this practice advice, to provide updates on the progress of the work and to seek the perspective of review officers and leads on different issues pertaining to IMRs. We have also obtained written feedback on the practice advice as well as exploring the views and reflections of review officers and leads within focus groups. We have discussed and reviewed these insights at various stages as a team and have incorporated them into the documents.

What sources of information have you used to develop the checklists?

The checklists have been informed by a range of sources, including our own analysis of a sample of 48 IMRs from 11 forces, and the learning points and recommendations within 30 published statutory reviews. We also reviewed an IMR template provided by an English police force, and a number of toolkits and templates included within guidance documents pertaining to review systems in England and Wales.

Please see the appendix of the practice advice for a list of the sources of information used to inform this work.

Review officer wellbeing

Reviews concern tragic incidents and require review officers to spend considerable amounts of time looking at a large amount of distressing material in great detail. How can review officers support themselves and look after their own wellbeing when being exposed to this kind of content on a regular basis?

Oscar Kilo resources

The Oscar Kilo (The National Police Wellbeing Service) website provides evidence-based support and guidance for police forces across England and Wales.

One of the resources on the Oscar Kilo website is the <u>Wellbeing of investigators toolkit</u>. This toolkit, in its second iteration, was designed to support the wellbeing of investigators dealing with the impact of continual exposure to trauma, and high workloads. The tools in the toolkit include <u>wellbeing support plans</u> which can be used as a personalised, practical means to identify what keeps you well at work.

Oscar Kilo have also released three series of a podcast called <u>'Keeping the peace'</u>. These podcast style interviews discuss police wellbeing and cover a range of topics, including stress, bereavement, the impact that policing work can have, and making police wellbeing more accessible.

Other resources

The Forensic Capability Network launched a <u>Forensic Investigators Wellbeing Toolki</u>t in 2024 to support the wellbeing of forensic practitioners who are exposed to regular traumatic content throughout their careers. This work involved consultation with academic institutions, Oscar Kilo, and the wider community.

<u>Police Mutual</u> provide a range of services and support for police officers, staff, and their family. This includes resources dedicated to mental, physical, and social wellbeing.

Mind published an article that explains how to recognise the way you may be feeling, why this may be the case, and how to manage it. This page was published in 2022 and considers the impact of coronavirus on experiences in policing, however, much of the information and strategies are applicable more globally, and it provides a clear, simple description of many facets of wellbeing and mental health. The page is due for revision in 2025.

A team of psychologists at the University of Birmingham have been researching the wellbeing of staff in the criminal justice system who are exposed to traumatic material on a regular basis. They have developed resources and research to provide support, including videos to start conversations about wellbeing, and a list of strategies to employ. Resources - University of Birmingham.

Next steps

There are a number of agencies beyond policing who write individual management reviews. Do you intend to share these documents with them?

The practice advice has been designed for, and in consultation with, police review officers and the work informing its development has dealt specifically with police as we have noted a particular gap in the provision of clear guidance for this group.

However, we recognise that the recommendations will likely be valuable and relevant to other agencies who contribute to IMRs, beyond policing. We will endeavour to share this practice advice as widely as possible and would encourage other agencies to use and adapt these resources to meet their needs.

What do you see as the next step in embedding this work?

There are a number of agencies and individuals involved in the statutory review process, both within and outside of policing. We are cognisant of the value of having greater cohesion and a shared understanding between all involved.

We have worked with the communications team to develop a plan for wide dissemination of the practice advice through various channels. It will be shared with appropriate contacts and will be available on our website. It is also intended that this work will inform the College's review officer training course.

NCVPP

National Centre for Violence Against Women & Girls and Public Protection

About the National Centre for Violence Against Women and Girls and Public Protection

We're a collaboration between the College of Policing and the National Police Chiefs' Council.

We work across law enforcement, the third sector and government to professionalise public protection and strive for a whole systems approach to prevent harm, give confidence to victims, survivors and witnesses to come forward and bring more offenders to justice.

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