

# RASSO victim impact assessment (RVIA)

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## Template

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This template is aimed at people developing policy, procedures or practices in police forces.

Its purpose is to enable the rights and interests of victims of sexual violence <sup>i</sup> to be carefully considered and embedded during that development process by carrying out RASSO (rape and serious sexual offences) victim impact assessments (RVIA). An important part of the RVIA is to make sure that police forces are thinking about all victims, making sure that policies, procedures and practices work for people from marginalised and minoritised groups <sup>i</sup>.

This template is accompanied by **guidance**. 



The sections on **Key information** and **Screening** should be completed in the early stages of the development (or discontinuation) of all relevant policies, procedures and practices. If the screening determines that an RVIA is needed, the full RVIA template should be filled in, alongside the development of the policy, procedure or practice.

 Denotes fillable fields - please type here.

## Key information

Name and brief description of policy, procedure or practice	Please type here.
Person responsible for RVIA	

## Screening



Not all policies, procedures and practices require an RVIA.  
If any of the following apply, you should complete a proportionate RVIA:

### Policies, procedures and practices for all or groups of victims, that is:

- policies, procedures and practices specifically for RASSO victims
- policies, procedures and practices for all victims, as this includes victims of sexual violence
- policies, procedures and practices for groups of victims, such as victims of domestic abuse or victims with learning disabilities, that will include victims of sexual violence

### Policies, procedures and practices affecting the investigation of RASSO cases as these will normally impact on victims, including:

- policies, procedures and practices that are specifically about RASSO investigations
- policies, procedures and practices that are about wider force practices including RASSO investigations

Is an RVIA needed for this policy, procedure or practice?	
If no, has this decision been discussed with the multi-agency rape strategic group? (Date and comments)	
If no, has this decision been agreed with chief officers? (Date and comments)	

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# Carrying out a full RVIA

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If screening has determined that an RVIA is needed, a full RVIA should be carried out using the rest of this template alongside the development of the policy, procedure or practice. The full RVIA has five phases, with stakeholder engagement as a vital, cross-cutting element throughout the RVIA.



## Stakeholder engagement

### Who should be involved in this RVIA?

Consider who you already have relationships with, as well as any gaps, such as by and for services for minoritised and marginalised communities. <sup>1</sup> How can these gaps be filled?

### How and when will you involve stakeholders in the RVIA?

What will you need to do to support engagement. For example, what information will need to be provided to stakeholders? How will you feed back to stakeholders about what changes are made because of their engagement?

### If you are planning to directly engage with victims in this RVIA, how will you make sure this is done safely and effectively?

What support will be in place for victims? How will you make sure that your engagement plans are effective for all victims, including those from marginalised and minoritised communities?

## Phase 1: planning a proportionate RVIA



### Scoping the potential impact of this policy, procedure or practice development or change on victims' rights and interests, including:

- Which aspects of procedural justice and which rights under the Victim's Code do you expect to be affected by this policy, procedure or practice?
- Are there likely to be any particular impacts on victims from already marginalised and minoritised groups?

### What resources are needed to carry out this RVIA?

Consider police colleagues, resources for effective stakeholder engagement, resources for information gathering.

### What is the timeline for this RVIA?

Consider interaction with other impact assessments, when the RVIA will be fed back to stakeholders, note expectations for publication, identify when the RVIA will be reported to chief officers.

## Phase 2: information gathering



**What information do you need to consider the impact of this policy, procedure or practice on victims of sexual violence?**

What existing sources of information do you have?

What are the gaps in your information?

What information can you use to support your understanding of this issue where there are gaps (for example, collect new information, consult with stakeholders, look at national information)?

**Consider the extent to which the information you are looking at relates to all victims, such as those from minoritised and marginalised groups:**

Can numerical data be broken down by protected characteristics?

Does qualitative information leave out any groups of victims?

**What actions are you going to take to fill any gaps in your information for the longer term?**

**Summarise stakeholder feedback around information gathering:**

## Phase 3: analysing impacts



**Describe any potential adverse impacts of the proposed policy, procedure or practice to victims' rights and interests, in particular:**

- Does the policy, procedure or practice present risks to the force of not complying with the five principles of procedural justice?
- Does the policy, procedure or practice present risks to the force regarding providing for victims' rights under the Victims' Code?

<b>Are the potential adverse impacts more severe for any already marginalised or minoritised victims?</b>	
<b>Main stakeholder feedback around adverse impacts:</b>	

**Where any adverse impacts of a policy, procedure or practice proposal are identified, you should consider the likelihood and severity of these impacts, in order to structure your response. This should be discussed with stakeholders.**

**We have provided some sample severity assessment grids below, and you can find more in appendix 1. These should be completed for each adverse impact identified.**

<b>Summary of adverse impact:</b>				
	<b>Unlikely</b>	<b>Possible</b>	<b>Probable</b>	<b>Stakeholder feedback on severity and likelihood assessment:</b>
<b>Moderate adverse impact</b>				
<b>Severe adverse impact</b>				

**Additional severity assessment grids in appendix 1 ([click here](#))** 

<p><b>Describe any potential positive impacts of the proposed policy, procedure or practice to victims' rights and interests, including:</b></p> <ul style="list-style-type: none"> <li>• Does the policy, procedure or practice enhance the ability of the force to interact with victims in ways that meet all five aspects of procedural justice?</li> <li>• Does the policy, procedure or practice enhance the ability of the force to provide for victims' rights under the Victims' Code?</li> </ul>	
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All the adverse impacts identified must be managed. The first step is to consider whether the adverse impact can be prevented. If, and only if, adverse impacts cannot be prevented, then the force must provide a justification for this, and consider how to mitigate the adverse impacts identified.

Summary of adverse impact	<p><b>Can this impact be prevented?</b>                      If yes, explain how:</p> <ul style="list-style-type: none"> <li>• Should the policy, procedure or practice be stopped?</li> <li>• What will happen instead?</li> <li>• Should the policy, procedure or practice be amended?</li> <li>• If so, how?</li> </ul> <p>If this impact cannot be prevented, provide a justification.</p>

Additional table space for managing impacts in appendix 2 ([click here](#)) 

<p><b>Main stakeholder feedback on adverse impacts that cannot be prevented:</b></p>	
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For impacts that cannot be prevented, an impact mitigation plan must be drawn up, with monitoring of mitigation activities to ensure that they are achieving their aims. This will be most effective when developed with stakeholders. See sample mitigation plan in appendix 3.

Stakeholder feedback on mitigation planning:

Sample mitigation plan in appendix 3 ([click here](#))

## Phase 5: monitoring and publication



### Monitoring

To include review dates for:

- planned mitigation activities, to confirm that these are taking place and how effective they are
- any new data that was not available during the RVIA process, to consider how this information affects decision-making
- considering the whole of the RVIA, including any unintended impacts on victims of sexual violence (do this as a minimum when the policy, procedure or practice itself is being reviewed according to local timeframes)

Stakeholders should be involved in review activities.

Dates for review	What will be reviewed at this time?

Additional table space for monitoring in appendix 4 ([click here](#))



## Feeding back to and reflecting with stakeholders

It is important the stakeholders are provided with information about what has happened after their participation.

Summarise the main differences that stakeholder engagement has made and how this will be fed back:

Do you and/or stakeholders have any reflections on the process of stakeholder engagement in this RVIA? What would you keep the same next time? What would you do differently?

## Accountability and continuous development

Summarise the main learning for the force from this RVIA:

## Publication plans

This should have been decided, and discussed with stakeholders, during the planning of the RVIA and reported under phase 1 above. However, this may change during the process of conducting the RVIA and should be finalised now.

When will the RVIA be published?

How will the published RVIA be accessible to a range of stakeholders?

What arrangements need to be made for anonymising or redacting parts of the RVIA before publication?

If the RVIA is not to be published, what is the reasoning?

What alternative plans do you have to make sure the RVIA process is transparent?

# Severity assessment grids

Summary of adverse impact:				
	Unlikely	Possible	Probable	Stakeholder feedback on severity and likelihood assessment:
Moderate adverse impact				
Severe adverse impact				

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Summary of adverse impact:				
	Unlikely	Possible	Probable	Stakeholder feedback on severity and likelihood assessment:
Moderate adverse impact				
Severe adverse impact				



# Phase 4: managing impacts

Summary of adverse impact	<b>Can this impact be prevented?</b> <b>If yes, explain how:</b> <ul style="list-style-type: none"><li>• Should the policy, procedure or practice be stopped?</li><li>• What will happen instead?</li><li>• Should the policy, procedure or practice be amended?</li><li>• If so, how?</li></ul> <b>If this impact cannot be prevented, provide a justification.</b>

# Sample mitigation plan

Adverse impact identified	Action required	Responsible officer	How will we know if the action has worked?	Timescale for monitoring	Resources needed

**Phase 5: monitoring and publication**

<b>Dates for review</b>	<b>What will be reviewed at this time?</b>



# RASSO victim impact assessment (RVIA)

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## Guidance

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# 1. Introduction

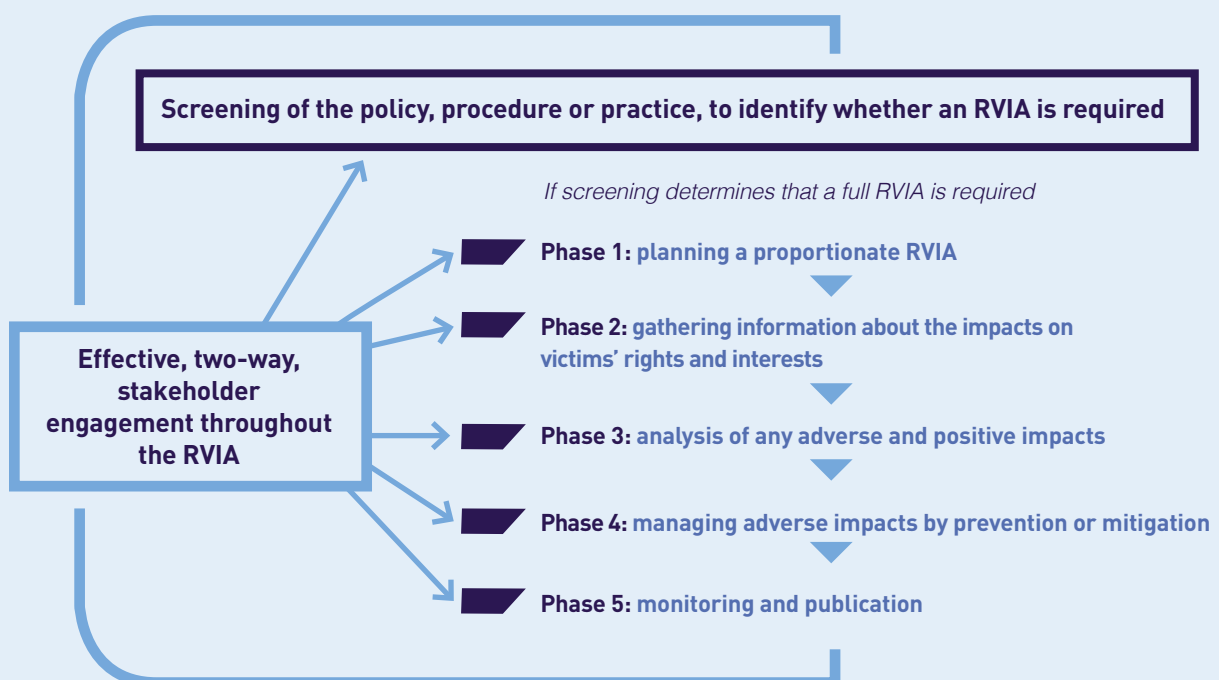
The purpose of this guidance is to enable the rights and interests of victims of sexual violence<sup>i</sup> to be carefully considered and embedded during the development of policy, procedures and practices within police forces by carrying out RASSO (rape and serious sexual offences) victim impact assessments (RVIA).

This guidance is aimed at people developing policy, procedures or practices within police forces but will also be of interest to both local and national organisations who want to know more about how police forces are developing policies, procedures and practices which respect the rights and interests of victims of sexual violence.

## 1.1 What is a RASSO victim impact assessment (RVIA)?

A RASSO victim impact assessment (RVIA) is a structured process to identify, prevent and/or manage any potential adverse impacts of police policies, procedures or practices on victims of sexual violence. A key part of the RVIA is to ensure that police forces are thinking about all victims of sexual violence; for example, ensuring that policies, procedures and practices work for people from marginalised and minoritised groups<sup>i</sup>.

The RVIA is a systematic framework involving:



## 1.2 What are the benefits of doing RVIA's?


- Carrying out RVIA's will give individual police officers confidence that when they are carrying out their day-to-day roles, the policies, procedures and practices they are following have already considered the rights and interests of victims of sexual violence, including victims from minoritised and marginalised groups. Police officers will therefore have greater certainty that their actions are doing a good job for victims.
- RVIA's contribute to improved police performance, which may save policing resources, as unintended consequences are avoided, and improve victim and public confidence in policing.
- The process of doing RVIA's should contribute to improved capacity within police forces to consider the rights and interests of victims of sexual violence, improved partnership working through the stakeholder engagement work and a better understanding of the local context for victims through gathering information and addressing information gaps.

## 1.3 When should an RVIA be carried out?

An RVIA should be carried out whenever a policy, procedure or practice that affects victims of sexual violence is being created or revised. The RVIA should be carried out alongside the development work; an RVIA is not a process carried out after a new policy is finalised.

- 'policy, procedure or practice' means all strategic decisions being made about how local policing will be carried out.

- This includes policies, procedures and practices at all levels, for example team specific, force wide.
  - This includes decisions that are formally called policies and procedures as well as informal decision-making within a team about how work will be carried out, such as local decision made about how to prioritise cases when there is a staff shortage.
  - This includes decisions not to do something, for example a RASSO unit deciding not to follow RASSO National Operating Model (NOM) guidance on the provision of No Further Action (NFA) letters.
  - This includes where decisions are made by an external service provider (such as a sexual assault referral centre (SARC) changes its hours of operation) and the police service must revise policies, procedures or practices considering that change.
- The RVIA is not a tool for individual police officers working on and making decisions about individual cases.

**See section 3.1 What policies, procedures or practices require an RVIA?** for guidance on screening policies, procedures or practices to determine if they have an impact on victims of sexual violence. 

The RVIA should be proportionate to the impact of the policy, procedure or practice on victims of sexual violence. In many situations, it would not be necessary to carry out a full RVIA, though forces may prefer to do this initially to develop expertise in thinking in this way.

Stakeholder engagement is always critical to an RVIA, including where decisions are made not to conduct an RVIA. Stakeholders should be provided with a mechanism to request a full RVIA where they identify a police policy, procedure or practice with significant impact on victims of sexual violence.

Once a force has appropriate expertise in carrying out RVIAs, we anticipate that the full process would be required once or twice a year depending on strategic planning, for example when a force carries out a major relevant change such as restructuring

investigation teams, reviewing arrangements for first response or revising roles within a RASSO team.

The person in charge of creating any new or reviewing existing policies, procedures and practices is responsible for ensuring that screening is carried out and an RVIA completed where appropriate. Chief officers have overall responsibility for ensuring that all new or revised policies, procedures and practices have been screened to determine if an RVIA is relevant and that RVIAs have been carried out to an appropriate standard.

## Example

### Summary of RVIA - first response to reports of sexual violence

#### Screening

- A police force is considering a change to its call handling and response policies, where victims reporting a rape that is not forensically live could be offered a scheduled appointment with a specialist officer in the first instance, rather than being assigned to a uniformed officer to attend when possible on their shift. As this is a policy specifically aimed at victims of sexual violence, it is determined that an RVIA is required.


#### Phase 1:

##### planning a proportionate RVIA

- This proposal has arisen from concerns around sexual violence victims' experience of their initial police contact discussed at the multi-agency rape strategic group (see the [Police-Independent Sexual Violence Adviser/Advocate \(ISVA\) Memorandum of Understanding Framework](#) for more information). This policy proposal is aimed at improving the victims' experience particularly in terms of safety.
- A timeline and outline process for the RVIA is agreed with the multi-agency rape strategic group.

#### Phase 2:

##### information gathering

- The force identifies existing information to review, including their local breakdown of the [Victim Experience Survey](#), which includes victims' perceptions of whether they felt safe in their interactions with the police. The police force notes that they have few responses in this survey from victims of colour and consider how they can advertise the survey better to these communities in their area.
- The police force consults with response and specialist officers about their perceptions of how the first interaction affects their relationship with victims, as well as around resource implications.
- The force dedicates time at the multi-agency rape strategic group to fully understand the issues raised by ISVA and other organisations around victims' first contact with the police. This discussion also identifies that the group does not include representation from some local by and for services , and the force arranges to go to those services to seek their expertise.

### Phase 3:

#### analysis of impacts

- The force's analysis identifies potential positive impacts, for example that offering victims a choice about how the force responds to their initial report and acting on that choice speaks to the principle of voice and recognition in procedurally just treatment ([see section 2.1](#)). However, this benefit would only be realised if the victim's choice is acted upon.
- The force identifies further potential benefits for victims, such as a non-uniformed officer attending at a time agreed with the victim could support victim safety. For marginalised victims in-person interpreters or other services could be booked in advance to also attend the appointment. This is relevant to achieving the fairness principle of procedurally just treatment.
- When gathering information with by and for services in their area, the force is made aware of existing concerns around interpreters. One service working with minority communities describes how sexual violence is highly stigmatised in that community. Using interpreters from within that community can therefore be a barrier to victims talking about what has happened. The proposed policy is further developed to prompt a discussion to be had with victims before the appointment is arranged about what would best enable them to talk to the police, including interpreters.
- The force identifies some potential adverse impacts in terms of providing a timely response to victims, particularly if specialist officers were pulled into other work and appointments missed. These adverse impacts are considered severe. Failing to follow through on agreements with victims early in an investigation may be particularly damaging to victim trust, and this is likely to occur given investigator workloads.

### Phase 4:

#### managing impacts

- The force identifies that some of the adverse impacts in terms of timely responses can be prevented by some reorganisation of investigator resource. Mitigation measures are identified for where these cannot be prevented, including rearranged appointments being given priority.

### Phases 5:

#### monitoring and publication

- The force decides to pilot the new policy of offering appointments to victims of sexual violence that are not forensically live.
- The pilot includes specific arrangements to monitor timeliness concerns. Discussions are held with stakeholders, including the by and for service, around when and how to gather their feedback in terms of victims' experiences including minoritised victims.
- The force commits to fully reviewing the pilot with stakeholders and internal colleagues in six months before making a final decision on the policy, after which the RVIA will be published.

## 2. What are the key standards and principles which the RVIA based on?

Police actions in relation to victims of sexual violence should be guided by four main sources of standards and principles. The RVIA aims to ensure police integrate these standards and principles into the development of policies, procedures and practices which have an impact on RASSO victims.

### The RVIA is based on four key standards and principles:

Procedural Justice for Victims of Sexual Violence as outlined in the National Operating Model for the investigation of rape

The Victims' Code

The Equality Act 2010, in particular the Public Sector Equality Duty, and the Human Rights Act 1998

Other legislation, guidance and policy relating to RASSO and policing

### 2.1 Procedural Justice for Victims of Sexual Violence

[Procedural Justice for Victims of Sexual Violence as outlined in the National Operating Model for the investigation of rape, developed through Operation Soteria](#)

There are five principles of procedural justice for victims of sexual violence:

- **Fairness:** Unbiased treatment and equal opportunity for all victims.
- **Dignity and respect:** Victims are not dehumanised, and their experience, rights and interests are taken seriously.
- **Voice and recognition:** Barriers to victim participation are removed, and their choices, queries and concerns are listened and responded to.
- **Safety:** Victims' safety concerns are identified and acted on, and they are not exposed to further harm through participating in or exiting an investigation.
- **Trustworthiness:** Police officers and forces are consistent and sincere in their responses to victims, and police actions are transparent and accountable.

## 2.2 Code of Practice for Victims of Crime in England and Wales

[The Victims' Code](#) sets out 12 rights that must be met by service providers as a minimum standard. The Code also states that victims have a right to be treated with respect, dignity, sensitivity, compassion and courtesy and to make informed choices that are fully respected.

Victims of sexual offences are eligible for enhanced rights under the [Victims' Code](#).

Right 1	To be able to understand and to be understood
Right 2	To have the details of the crime recorded without unjustified delay
Right 3	To be provided with information when reporting the crime
Right 4	To be referred to services that support victims and have services and support tailored to their needs
Right 5	To be provided with information about compensation
Right 6	To be provided with information about the investigation and prosecution
Right 7	To make a victim personal statement (VPS)
Right 8	To be given information about the trial, trial process and a victim's role as a witness
Right 9	To be given information about the outcome of the case and any appeals
Right 10	To be paid expenses and have property returned
Right 11	To be given information about the offender following a conviction
Right 12	To make a complaint about a victim's rights not being met

## 2.3 The Equality Act 2010, in particular the Public Sector Equality Duty, and the Human Rights Act 1998

The public sector equality duty (PSED), contained in part 11 of the [Equality Act 2010](#), requires that the police have due regard to:

- **eliminating unlawful discrimination, harassment and victimisation**
- **advancing equality of opportunity between different groups**
- **fostering good relations between different groups.**

Many public sector organisations use equality impact assessments to consider and manage the impacts of policies, procedures and practices as they are developed to meet these legislative requirements, and these are specifically required under Welsh regulations.

There is a considerable overlap between the requirements of the Equality Act 2010 and providing a procedurally just response to victims of sexual violence. One of the key components of procedural justice is fairness, requiring recognition of the differing needs and contexts of victims. For example, enabling a woman with learning disabilities to give her best evidence in a video recorded interview may require different procedures from enabling a woman from a minoritised community with young children to give her best evidence. Just as the police officers investigating RASSO cases are whole people with many things going on in their lives beyond that investigation, so are those affected by RASSO.

[The Human Rights Act 1998](#) requires that the police act in a way that is compatible with the European Convention on Human Rights. Rights that are particularly relevant to those affected by sexual violence are Article 2 (the right to life), Article 3 (the right not to be subject to torture or other inhuman or degrading treatment) and Article 8 (the right to private and family life). Again, there is considerable overlap between the requirements of the Human Rights Act and providing a procedurally just response to victims of sexual violence. For example, where police forces are not achieving the safety element of procedural justice for victims of sexual violence, they may be breaching all three of these human rights.

## 2.4 Other legislation, guidance and policy relating to RASSO and policing

**There is a wide variety of legislation, guidance and policy relating to RASSO and policing. At the time of writing, in relation to the victims' rights and interests, some key items are:**

- The Sexual Offences Act 2003 which sets out the range of criminal offences which protect everyone's right not to be subject to sexual behaviours to which they do not consent (in some cases, legislation prior to the Sexual Offences Act will be relevant). The criminal offences protect everyone, including those who sell or exchange sex, people from all ethnic or other minority groups and people with insecure immigration status.
- Legislation, guidance and case law requiring that the police only extract information from a victim's digital device or examine third party materials such as medical information where they have a reasonable belief that information is relevant to a reasonable line of enquiry (the Policing, Crime, Sentencing and Courts Act 2022, The Attorney General's Guidelines on Disclosure, R v Bater-James [2020] EWCA Crim 790).
- Achieving best evidence in criminal proceedings guidance which sets out best practice for working with vulnerable witnesses, including appropriate preparation for video-recorded interviews and aspects of interviewing that will enable a witness to provide their most reliable and accurate information, such as being able to have supporters.



# 3. Screening: is an RVIA needed?

Not all police policies, procedures and practices are relevant to the rights and interests of victims of sexual violence and therefore an RVIA is not always required. Screening should be carried out to identify if an RVIA is required and the scope of that RVIA proportionate to the impact on victims of sexual violence.

Screening should be carried out at the beginning of developing any new policies, procedures or practices. It should also be carried out at the early stages of revising any existing policies, procedures or practices (including a decision to discontinue them). There will also be circumstances where it will be appropriate to carry out an RVIA on an existing policy, procedure or practice, such as where a multi-agency rape strategic group or other stakeholder forum requests an RVIA or is otherwise raising concerns about the impact of a policy, procedure or practice on the rights or interests of victims of sexual violence.

The person in charge of creating any new or reviewing existing policies, procedures and practices is responsible for ensuring that screening is carried out and an RVIA completed where appropriate.

## 3.1 What policies, procedures or practices require an RVIA?

**There are two main groups of policies, procedures or practices that require an RVIA.**

- **Policies, procedures and practices for all or groups of victims**
  - Policies, procedures and practices specifically for RASSO victims
  - Policies, procedures and practices for all victims, as this includes victims of sexual violence
  - Policies, procedures and practices for particular groups of victims, such as victims of domestic abuse or victims with learning disabilities that will include victims of sexual violence.

- **Policies, procedures and practices affecting the investigation of RASSO cases as these will normally impact on victims.**
  - Policies, procedures and practices that are specifically about RASSO investigations
  - Policies, procedures and practices that are about wider force practices including RASSO investigations

### **Policies, procedures and practices for all or groups of victims**

- An RVIA will be required where a policy, procedure or practice is designed for RASSO victims.

For example: where a force is reviewing its procedures for victims of sexual violence to provide their achieving best evidence (ABE) interview.

- An RVIA will be required where a policy, procedure or practice is for all victims, as this includes victims of sexual violence.

For example: a force decides to review its call handling policies to ensure it is meeting the standards set out in the Victims' Code.

- An RVIA will also be required where a policy, procedure or practice is aimed at a group of victims which includes victims of sexual violence.

■ For example: a force is reviewing its provision of information in accessible formats for victims with learning disabilities, as these include victims of sexual violence.

■ For example: a force is reviewing its policies and training around domestic abuse cases, including use of risk assessments (such as DASH (domestic abuse, stalking and so called 'honour based' violence), DARA (domestic abuse risk assessment) or other tools). Approximately one third of sexual violence cases have a context of domestic abuse, and this review will therefore affect sexual violence victims.

### **Policies, procedures and practices relating to RASSO investigations**

Policies, procedures and practices relating to RASSO investigations will normally also affect RASSO victims. This includes not only those policies, procedures and practices which are specifically aimed at RASSO investigations, but also those around wider police practices including RASSO investigations.

■ For example: the sexual assault referral centres (SARCs) in the force area are proposing reducing their opening hours to 9-5, Monday to Friday and the force is reviewing its policies, procedures and practices in response to these changes. Through an RVIA, the force identifies a range of adverse impacts, such as difficulties in accessing the SARC for a range of victims (including victims with childcare responsibilities, victims engaged in selling or exchanging sex). The RVIA is likely to be particularly useful to the police force in this instance to negotiate with the provider of the SARC and/or jointly work with them in terms of negotiating with the funder of SARC services around whether the proposed changes can be changed or stopped.

■ For example: Proposals to restructure investigation teams, including the creation or disbanding of a dedicated RASSO team, or removal or creation of administrative support for RASSO investigations will require an RVIA. Potential impacts on victims of sexual violence include: where restructuring affects the workload of investigators, thereby affecting victims' rights to be updated in a timely manner; where restructuring affects the training or specialism of investigations, particularly affecting marginalised or minoritised victims as investigators may not be aware of specialist services available to victims nor of particular safety issues for those victims.

### **Policies, procedures and practices that do not require an RVIA**

Not all new policies, procedures and practices, or revisions to them, will require an RVIA. For example, there may be changes to IT systems, HR policies or facilities management that do not affect RASSO victims.

Where there is any uncertainty around whether a policy, procedure or practice requires an RVIA, this should be discussed with the multi-agency rape strategic group or equivalent stakeholder forum. Where it is determined that a policy, procedure or practice does not require an RVIA, this should be agreed by chief officers.

### **3.2 What is a proportionate RVIA?**

The RVIA sets out a structure to enable forces to ensure that the rights and interests of victims are effectively integrated into policy, procedure or practice development. While forces may find it useful to follow the full template and process as they build up expertise in this way of thinking, it is anticipated that the full RVIA or template would only be used for larger policy, procedure or practice development with a significant impact on victims of sexual violence. Where forces have strong relationships with stakeholders, supporting effective two-way discussion and challenge, and the impact of the policy, procedure or practice on victims of sexual violence is more specific or circumscribed, forces may wish to streamline the RVIA process.

# Example

## A streamlined RVIA process: force policy for car allocation

- A force is reviewing policies and procedures around car allocation, including when unmarked vehicles may be allocated. This has not been identified by the force as having an impact on victims of sexual violence. While an RVIA is not therefore deemed required, this piece of work is flagged for information to the multi-agency rape strategic group.
- The multi-agency rape strategic group note that while much around vehicle allocation is not relevant to victims of sexual violence, there are impacts because, for example, it is a rural force and victims may need to be driven long distances to SARC facilities or to provide their ABE interview.
- An ISVA service has been working closely with a by and for service for a community of minoritised women in the force area where there are very high levels of stigma around being raped. The service is small and unable to attend the multi-agency rape strategic group, but the ISVA service reports on their behalf that women have been reporting safety and privacy concerns around police transport, for example being afraid of a marked vehicle showing up at their home to collect them, and what this will mean in terms of the questions they are asked in their community. The by and for service reports that such women are refusing police transport because they are worried about their safety, but struggle to access the police station by public transport.
- The officer leading the meeting suggests they make an exception to the policy where unmarked vehicles can be used for victims of sexual violence to prevent this adverse impact.
- The multi-agency rape strategic group is attended by operational officers to answer any questions about rape investigations. One officer notes that they would expect to have a conversation with any woman before attending the ABE interview about what would be necessary to make it possible for the woman to give their best evidence. They would discuss transport during this conversation. It would not be difficult to include safety concerns as part of this conversation, including explicitly asking about marked or unmarked vehicles. The officer volunteers to disseminate this action to colleagues and to feed back to the group as to how it is working.
- The force notes that they do not currently have information about car allocation that would allow any consideration of protected characteristics of victims. They consider with the stakeholders how they could monitor this issue. The ISVA service volunteers to liaise with the by and for service, informing them about what has happened and bringing their feedback around the experiences of their clients back to the group.
- The force agrees to review the operation of the new policy, and the exception for victims of sexual violence, with the multi-agency rape strategic group in six months. The conversation and its actions will be recorded using the RVIA template as the basis for that review, but the group agrees with the force that a full RVIA is not necessary as the RVIA phases have been carried out effectively through these discussions and their actions.



# 4. Stakeholder engagement

Engaging with RASSO stakeholders, particularly those who work with victims, is a vital, cross-cutting element of any meaningful and effective RVIA.

## 4.1 Why do we need to involve stakeholders in doing an RVIA?

**Engagement with stakeholders throughout the RVIA process is essential. Stakeholders bring a variety of expertise to enable the rights and interests of victims to be carefully considered, including:**

- expertise around identifying which policies, procedures and practices are relevant to victims of sexual violence (**screening**)
- identifying and providing information about how victims of sexual violence experience police policies, procedures and practices (**information gathering**)
- helping to design and support measures put in place to mitigate adverse impacts on the rights and interests of victims (**analysing and mitigating impacts**).

Stakeholders can and are likely to have different views on the impacts of policies, procedures and practices on victims and on the best ways to mitigate these. This may relate to different experiences of different people they work with, or different ways that they as organisations experience police policies, procedures and practices and the criminal justice system. The RVIA should be used to capture any differences in opinions as these may highlight important aspects for monitoring and mitigation strategies.

## 4.2 Who are the relevant stakeholders?

When planning the RVIA, consideration must be given to identifying stakeholders to be involved. This will include identifying, and documenting in the RVIA, any gaps or limitations.

Stakeholders is a broad term and includes a wide range of individuals and groups:

- **Internal police colleagues**
  - For example: this might include people with particular expertise around the policy, procedure or practice under review such as HR or investigators in that area; colleagues with particular community links; colleagues with experience of conducting impact assessments; police force lawyers.
- **Criminal justice system organisations that affect victims' experiences alongside policing**
  - For example: this might include the CPS, bringing particular expertise around how policing policies, procedures and practices might interact with prosecution decisions; this may include the PCC who would have expertise around the provision of services for victims.
- **Organisations representing and working with victims, who can both speak to and speak about victims**
  - This will include, but is not limited to, ISVA organisations.

- Particular consideration must be given to by and for services. Policy, procedure and practice changes may have the most detrimental impact on those who are already minoritised and marginalised, making it crucial that these impacts are understood in the RVIA process. These organisations may be smaller, with particular funding constraints, that restrict their ability to take part in ongoing force consultation work. It is necessary therefore for police forces to actively consider how to enable engagement with such stakeholders.
- **Other interested parties with relevant expertise**
  - For example: researchers and academics.

When reporting on stakeholder engagement in the RVIA it will be important to think about whether contributions are anonymised. This may be relevant in terms of organisations, but particularly in terms of any direct engagement with victims and contributions from individual police colleagues.

### 4.3 How do we make engagement with stakeholders effective?

Meaningful engagement is a two-way process, not only telling stakeholders what is happening, but working with stakeholders around designing solutions and making sure that they can see what has changed as a result of their participation.

- Part of engaging meaningfully with stakeholders involves considering and agreeing with stakeholders the best ways for that participation to happen.
- There are a variety of mechanisms to engage with stakeholders including short online surveys, discussions in existing bilateral meetings and forums such as the multi-agency rape strategic group, focus groups.
- Many stakeholders will be voluntary groups that have limited time and resources. It may not be possible for them to take the time and the travel expense to come to you for meetings. This may be particularly true of smaller by and for services supporting more minoritised and marginalised victims.
- You may therefore need to be creative in how you provide opportunities for and enable stakeholder engagement, and provide recompense for stakeholder time where appropriate.
- There may be benefits both to the police and to stakeholder organisations in combining engagement for an RVIA with ongoing mechanisms, such as the multi-agency rape strategic group. However, this also has the potential to doubly exclude organisations that are not part of this group, such as smaller by and for services.
- Where you are conducting a very large RVIA as part of a substantial review it may be worth having a specific stakeholder advisory or reference group.
- It may improve engagement to think about, and talk with stakeholders about, what stakeholders could or would like to gain from being involved in an RVIA, such as better understanding of policing practices.
- Meaningful engagement requires police forces to share information with stakeholders. People can only engage effectively with consultation if they have enough information to understand what they are being consulted about.
- Beware of consultation ‘fatigue’ where organisations may become frustrated with being regularly asked the same questions or to take part in similar consultations. This is particularly likely to happen where organisations are not seeing any changes happen as a result of their participation.

#### 4.4 Should we engage directly with victims as part of conducting a RASSO victim impact assessment?

Engaging directly with victims could be an important way for a police service to be transparent around its policy, procedure or practice development and to empower victims to contribute to better policing. However, for many RVIAs it would not be appropriate or viable to directly engage with victims for some of the following reasons:

- Many victims of rape and sexual assault have negative experiences of engaging with police during investigations and have shared these. It is not always necessary or respectful to keep asking victims to tell us about some of the same problems again. It is important to respond to the experiences and information victims have already shared by changing how police operate to better respect victims' rights and interests.
- If victims are to be directly consulted, it is crucial that this is done in ways which ensure victims' safety and empowers them to effectively participate. This will require specific resource and expertise. For example, there must be systems in place to ensure that support is available for victims being consulted to manage any adverse impacts and re-traumatisation. Consultation with victims, like any other interaction with victims, must fulfil the five elements of procedural justice. For example, police forces must exhibit trustworthiness by making commitments to feed back what happens as a result of victim participation and provide this feed back as agreed.

- It may be possible to use existing engagement and support mechanisms to engage directly with victims to support an RVIA. For example, you may have victim participation panels, including victims of sexual violence, which already have support mechanisms built in.
- Where it is not appropriate to directly engage with victims, some organisations, including but not limited to ISVAs, have expertise around victims' experiences, and the participation of these organisations can bring victim experiences into the RVIA process without engaging with victims directly.



# 5. Phase 1: planning a proportionate RVIA

The work involved in carrying out the RVIA should be proportionate to the likely impact on victims' rights and interests of the policy, procedure or practice. Some of this work will have been carried out in screening the policy, procedure or practice, but forces should now complete their scoping to identify the scale of the RVIA required and put in place appropriate resources.

- Police forces should undertake an initial scoping of which aspects of procedural justice are most likely to be affected and any rights under the Victims' Code that are relevant.
  - Police forces should also consider how the policy, procedure or practice will impact differently on victims with different contexts, backgrounds and protected characteristics, in particular whether there are likely to be particular adverse impacts on already marginalised and minoritised groups.
  - This work will help determine the scale of the RVIA, but also enable the force to effectively target information gathering in the next phase of the RVIA.
  - what support is required from police colleagues, such as learning and development staff with expertise in carrying out impact assessment, RASSO subject specialists and other operational officers, force lawyers or other specialist police roles
  - what resources are needed to carry out the RVIA including to enable engagement with stakeholders and other information gathering
  - whether the RVIA should be combined with other impact assessments (for example, data protection, equalities)
  - what is the planned timeframe for completing the RVIA including feeding back to stakeholders
  - what the initial plans are for monitoring and continuous improvement ([see Phase 5](#)) including whether the completed RVIA will be published and when it will be returned to chief officer for oversight.
- Police forces should plan key practicalities at the beginning of the RVIA and put in place appropriate resources, including:
- who is going to be the lead person conducting the RVIA, with the possibility to, for example, commission a local specialist service to carry out a large or complex RVIA where that expertise is deemed important





# 6. Phase 2: information gathering

Phase 2 of the RVIA focuses on gathering information so that police forces can make informed decisions around the impact of policies, procedures and practices on victims of sexual violence.

## 6.1 Why do we need to gather information to do an RVIA?

The purpose of the RVIA is to support police forces to think carefully about potential impacts on victims of sexual violence when designing or reviewing policies, procedures and practices. A key part of that is making informed choices based on both locally specific and national information about how victims' rights and interests are likely to be affected.

Research identified gaps in the information held by police forces, and that forces did not necessarily have a good understanding of the local context for victims. As part of the RVIA, forces are advised to consider what information would be useful to review the policy, procedure or practice under consideration, and where such information is not available, to decide on actions to collect it in the future. Over time, therefore, carrying out RVIAs will support forces to better understand their local context for victims, and therefore to better manage demand and resources around RASSO.

## 6.2 What information do we need to think about?

### Types of information

- Information about RASSO and RASSO victims and their experiences will come in a variety of forms.
- Some information will be numerical, such as information on the numbers of cases, how long cases take to be investigated and different outcomes.

- Other information will be qualitative, such as feedback from investigators on difficulties accessing intermediaries, comments from ISVA and other support organisations about trends that they are seeing in victims' experiences, and information from complaints.

### Using existing information

- Police forces have access to a wide range of existing information that may be relevant to the policy, procedure or practice that is under review. A key part of the RVIA is to consider what information is needed to identify any adverse impacts on victims, and to look at existing sources of information which may be helpful.
- Examples of existing information to which police forces will have access are staff surveys, the local picture of support services for victims, existing feedback mechanisms for victims, and data around police adherence to the Victims' Code standards.

### Gathering new information

- There will also be areas where existing information is not available, or it may be appropriate to set out to gather specific information for an RVIA.
- This might mean asking ISVA and other support services for feedback on a specific issue, or talking to officers in investigation teams about how a particular policy, procedure or practice would work day-to-day.



- In other cases, it may be possible to draw on existing national level information to provide a sense of likely impacts locally, for example to draw on national level information about the experience of transgender victims of sexual violence or victims' preferences around communication.
- In all cases where information gaps are identified, part of the RVIA process should be to identify where and how this information can be gathered more effectively in the future.

### **Making sure information tells us about all victims**

- A key consideration across all the information considered for the RVIA is how much it does or does not tell us about the impacts on the range of victims, including those from marginalised and minoritised communities, served by the police force.
- In terms of numerical data, it is important to look at how far this data can be broken down by protected characteristics.

**For example:** a police force is reviewing its information on the time between a report and a victim giving their ABE interview for an RVIA. This information is not available broken down by protected characteristics. Both operational officers and stakeholders are suggesting that the time is much longer for victims with learning disabilities, as there are difficulties getting access to intermediaries. This information would be useful to the police force in arguing for greater provision of intermediaries in their area.

- In terms of qualitative information, it is important to consider whether there are gaps such as whether information covers circumstances such as the experience of women with no recourse to public funds.

Where gaps are identified in information, or it cannot be broken down by protected characteristics, consideration should be given to how these information gaps can be managed in the RVIA (for example, by seeking information in other ways) but also how these gaps might be filled more effectively for the future.

### **6.3 How do we work with stakeholders to gather and analyse information?**

Stakeholders are crucial to gathering and analysing information for the RVIA.

- Stakeholders will have insights about what information is needed to consider a particular policy, procedure or practice

**For example:** a force is considering revising its procedures around achieving best evidence (ABE) interviews due to requests from the local CPS that ABEs be no longer than 40 minutes. The force is considering dip sampling a small number of cases to consider the impact of time limiting ABE interviews. A local organisation supporting victims with learning disabilities reports on a client who had a very positive experience of an ABE interview because the officer took the time, with an intermediary, to ensure they understood the questions and is concerned that a time limit would have particularly adverse impacts on their clients. The force decides to review a range of cases covering a variety of victims rather than to randomly dip sample cases.

- Stakeholders may have relevant information.

For example: when reviewing ABE interview procedures, ISVA organisations may have feedback from victims around their experiences of interview, whether they were offered supporters in or around the interview, whether they felt they would have been able to give better evidence with a supporter in or around their interview, and the organisation's views around whether it would be possible to have ISVAs available before/after interviews.

- Stakeholders will be able to support police forces in interpreting data.

For example: a police force RASSO unit notices that reports of rape from women engaging in selling or exchanging sex have dramatically declined in recent months. While this might appear to be good news, they are not aware of any particular arrests or prevention activity that would have caused this and ask the multi-agency rape strategic group if they have any insights. Stakeholders report that a community officer had worked extremely hard to build good relationships with women selling or exchanging sex in the force area. The officer had focused policing activities on tackling crimes against the women, including sexual violence. The women had a high level of confidence in this officer. However, that officer had moved on six months ago. Since his departure there had not been anyone in the force working on supporting these relationships, and there had been a charge against two women for keeping a brothel where they were using the same location for safety reasons. Stakeholders suggested that this had reduced the women's confidence in the police response to sexual violence, and was therefore the most likely cause in the reduction in reports, as the women were still experiencing high levels of sexual violence.



# 7. Phase 3: analysing impacts

Phase 3 involves analysing the information that has been collected to identify any impacts and assessing their likelihood and severity. This will involve drawing on the foundational principles of the RVIA, such as procedural justice and the Victims' Code, and findings from stakeholder engagement. In practice, some of this analysis will occur during information gathering itself, but it is nevertheless important to allocate time and space specifically for impact analysis.

## 7.1 What are adverse impacts?

Adverse impacts means where a new or amended policy, procedure or practice, by action or omission, would remove or reduce victims' rights or harm victims' interests. This is to be determined by reference to the fundamental principles underpinning the RVIA, including the principles of procedural justice and the Victims' Code.

For example: a force is considering restructuring its investigation teams, which includes removing a dedicated rape investigation unit and amalgamating this into a broader team investigating a variety of offences. During phase 3 of the RVIA, the force identifies a range of adverse impacts for victims of sexual violence:

- Victims are less likely to be having contact with officers with specialist training around sexual violence. This is likely to impact on the fulfilment of their rights under the Victims' Code, such as to be referred to ISVA or other specialist services, as non-specialist officers may be less aware of what is available. This is also likely to impact on their experience

of procedural justice, as non-specialist officers may be less aware of how to ensure victims' safety.

- Moving to a team investigating a range of offences is likely to impact on officers' caseloads and prioritisation, impacting on victims in a variety of ways. There may be increases in delays but also challenges for officers to provide updates to victims at times agreed due to being pulled into other cases. These impacts may be particularly severe for more marginalised and minoritised victims. Calling victims at different times than agreed may be particularly difficult for some neurodiverse victims, or for victims with childcare responsibilities, undertaking shift work, or living with extended families, all of which may limit their availability to talk in private.
- Increases in officers' caseloads, and reduced access to specialist training, may also impact on officer wellbeing and job satisfaction, affecting the quality of response that officers are able to give to victims.

## 7.2 How do we examine likelihood and potential severity of adverse impacts?

When a potential policy, procedure or practice has a wide range of adverse impacts, police forces may find it useful to work through the likelihood and potential severity of those adverse impacts, to help structure and prioritise how they are managed. This does not mean that some adverse impacts will not require addressing; all adverse impacts must be addressed. As in all other stages of the RVIA, stakeholder engagement will be crucial to help police forces think this through.

### How likely are the adverse impacts?

- Considering how likely it is that adverse impacts will materialise is an important aspect of deciding what steps need to be taken to prevent or mitigate the impacts. This does not mean that an unlikely impact is acceptable, as the risk may be too high if the possible adverse impact is severe.
- It may be helpful to think of potential impacts in terms of them being:
  - unlikely
  - possible
  - probable

### How severe are the adverse impacts?

It is also important to examine the potential severity of the adverse impacts as this will help to determine the steps to be taken in mitigation.


- Severity can be considered in terms of the scope (who is affected) and scale (seriousness of the impact), as well as the extent to which any impacts can be prevented or mitigated.
- Scope does not only refer to numbers affected but considers how different victims may experience the adverse impacts differently, with particular attention to impacts on victims that might be already marginalised and minoritised.

- The severity of the impacts should be considered from the perspective of those experiencing the adverse impacts, in relation to their local contexts, and should consider short and long-term consequences.
- It may be helpful to think of the severity of impacts in terms of them being:
  - moderate adverse impacts
  - severe adverse impacts
- As with assessing likelihood of adverse impacts, dialogue with stakeholders will be an important part of assessing severity.

## 7.3 What about any positive impacts?

- While the main purpose of the RVIA is to identify, and then manage, adverse impacts of proposed policies, procedures and practices, police forces may also find it helpful to document where policies, procedures and practices have a positive impact on victims' rights and interests.
- This will help forces to better identify the implications for victims' rights and interests of policing activities.
- However, it must be remembered that it is not possible to offset a breach of victims' rights in one area, by doing positive work in another. Therefore, documenting positive impacts is valuable for learning purposes, but may not be used as part of mitigation for adverse impacts.





# 8. Phase 4: managing impacts

If the RVIA identifies potential adverse impacts, the next stage is to consider whether those impacts can be prevented or mitigated. As with the other phases of the RVIA, this will be most effective when conducted with stakeholders. It is essential that adequate resources are assigned for this stage of the RVIA, including to address unanticipated impacts.

Particularly where the RVIA has identified impacts on marginalised or minoritised victims, it may be worth considering how to manage those impacts alongside similar work as part of equality impact assessment.

## 8.1. How can adverse impacts on victims' rights and interests be prevented?

- Where it has been identified that a policy, procedure or practice may adversely affect victims' rights or interests, the next step is to consider whether those impacts can be prevented.
- This may mean not introducing the particular policy, procedure or practice change under consideration, or developing an alternative to what is proposed.
- This is likely to require going back to the original purpose of the policy, procedure or practice and considering whether there are other ways to achieve those aims which do not produce the same adverse effects on victims' rights and interests.
- If, and only if, the adverse impacts cannot be prevented, then it should be considered how the impacts on victims' rights and interests can be mitigated.

## 8.2 If adverse impacts on victims' rights and interests cannot be prevented, how can these be mitigated?

- Where adverse impacts on victims' rights and interests have been identified but these cannot be prevented, the police force must seek to mitigate these.
- As with other phases of the RVIA, identification of mitigating activities is most likely to be effective when done in collaboration with stakeholders.
- Where actions cut across the criminal justice system, these may also have to be considered with other agencies, such as the CPS.
- Where many adverse impacts are identified, the force is likely to need a dedicated impact mitigation plan for the policy, procedure or practice.

### What is an impact mitigation plan and what should it include?

- An impact mitigation plan is a tool through which the force specifies how it will address the identified adverse impacts. The plan notes specific actions that will be implemented, assigns responsibility for each task and identifies how it will be monitored.

- Essentially, impact mitigation plans are a strategy for ongoing management of the adverse impacts. They summarise impact findings from the assessment and detail the measures to address them. Additionally, an impact mitigation plan establishes monitoring and reporting procedures and provides estimates of the timing, frequency, duration and cost of mitigation procedures.
- The impact mitigation plan will be most effective when drawn up in consultation with stakeholders.
- The police force should draw up an Impact mitigation plan detailing:
  - What are the adverse impacts
  - How each will be addressed, and whether these mitigation activities will reduce or eliminate the problem (where there will be ongoing adverse impacts, these should be notified to chief officers)
  - What are the resources needed to carry out these actions
  - How the mitigation activities will be monitored – first to ensure they are carried out and second to ensure that they achieve the required reduction in adverse impacts.

## Example

### Summary of RVIA: removal of administrative support to investigation teams

#### Screening

- A force is reviewing its provision of administrative support staff to all investigative teams, including therefore the rape investigation team.
- As this will have an impact on the rape investigation team, and therefore on victims of sexual violence, the force decides to carry out an RVIA.

#### Phase 1:

##### planning

- The project lead identifies in initial scoping that the administrative function currently allows RASSO investigators to focus on key investigative activities, and is likely therefore to contribute to the victims' experience of the timeliness of investigations.
- The project lead conducts a brief discussion with the multi-agency rape strategic group, where stakeholders comment on differences they experience with the current set-up, in contrast to an earlier set-up when admin support was not available.

#### Phase 2:

##### information gathering

- The force identifies that key information needed is around how the administrative support functions in the RASSO team and decides to conduct a small group consultation with specialist officers and admin staff. The small group reports that a lot of work went into developing the relationship between the admin staff and officers to ensure that admin staff could provide value, for example with appropriate guidance from the officer in charge, and following software training, to carry out redaction of third-party materials. The group suggests that this kind of activity frees up a lot of investigator time and speeds up cases going to the CPS. The force decides to also review information it has around timescales of cases before and during the current admin support structure to the RASSO team.

- The project lead also conducts a meeting with local ISVA services. ISVA services suggest that admin support is important to communication with victims, for example that it has been key when there is a change in officer in charge, keeping ISVA services up-to-date as a new officer is allocated, enabling ISVA services to ensure that the victim is supported through this change. The ISVA services also report examples of liaising with the admin function to confirm accessible car parking for a supporter to wait outside while a victim gave their achieving best evidence (ABE) interview or to check that an interpreter was qualified in the right language. They note positive feedback from victims as the admin function has been maintaining a list of local support services, including by and for services, enabling victims to be referred to a wide range of support depending on their individual needs.

### Phase 3:

#### analysing impacts

- The force identifies significant adverse impacts on victims of sexual violence from removing admin support from the rape investigation team, including longer investigation times and a loss of quality in their communication with victims. The likelihood of both adverse impacts are assessed as probable.
- The loss of quality in their communication with victims is deemed to be a severe adverse impact. It is inevitable that officers in charge will sometimes change, but this is a difficult time for victims and having the admin function ease this change for victims is important. The force also notes that the feedback from ISVA services suggests the admin support supports communication in particular with more marginalised and minoritised victims.

### Phase 4:

#### managing impacts

- The force argues that the adverse impacts should be prevented by not making this policy

change, and retaining the admin support in the RASSO team. The work done on the RVIA allows them to build a comprehensive business case around the role of the admin support, working with internal finance colleagues. Chief officers share this information also with the police and crime commissioner (PCC) looking particularly at how resources given to admin support enable Victims' Code compliance. The force can keep the admin support for the RASSO team for an initial period of six months to gather further information about how the admin support enables victims' rights and interests.

- As part of developing the business case for the admin support team, the project lead also developed and plotted the resources needed for mitigation measures as part of the RVIA. These included work to tailor the letter templates for NFA decisions and communication plan from the National Operating Model for the investigation of rape to the local context, so that these could then streamline officer communication with victims in the absence of admin support. This also included training for investigators around using these products and other training needs such as around redaction software.

### Phase 5:

#### monitoring and publication

- The force identifies with stakeholders and internal colleagues key areas for monitoring, including how the role of the admin workers impacts on victims from marginalised and minoritised communities.
- The RVIA is shared with the stakeholders who took part in the work and the multi-agency rape strategic group, with agreement to publish once a final decision is made around admin support in the RASSO team in six months.





# 9. Phase 5: monitoring and publication

A key focus of the RVIA is on transparency and accountability; the RVIA has the potential to support robust and productive relationships with stakeholders where police forces engage openly about the process and outcomes.

## 9.1 What happens to an RVIA after it is completed?

The purpose of conducting RVIAs is to support more effective policy, procedure or practice development which carefully considers the rights and interests of victims of sexual violence. As such, the RVIA is a tool that supports both internal and external discussion and reflection as policies, procedures and practices are developed, as well as supporting ongoing development through monitoring processes.

### What should be monitored?

- The most important monitoring of the RVIA is around planned mitigation measures. This monitoring seeks specifically to identify whether the actions agreed to address identified adverse impacts are implemented and whether the mitigation measures effectively address those impacts. Setting out monitoring of impact mitigation measures should therefore be an integral component of the RVIA and be included in the impact mitigation plan, setting out what is to be monitored, when, how often and by whom.
- In addition to providing information on whether the impact mitigation measures are effective, and making any necessary adjustments if they are not, ongoing monitoring provides an opportunity to identify any unforeseen impacts.

- If the RVIA identifies gaps in information available to the force, then a key part of monitoring will be to confirm that progress is being made around improving that information and to consider what impact new information has on policy, procedure and practice changes and mitigation measures.
- The entire RVIA should be revisited at a set date. Appropriate timepoints to review the RVIA should be identified, depending on the scale of the policy, procedure and practice and its impact on victims of sexual violence, to be as a minimum at the next review of the policy, procedure and practice.

### Engaging with stakeholders

- A key part of ongoing monitoring and continuous development from an RVIA is engagement with stakeholders. Returning to stakeholders with the RVIA, to discuss what has happened to prevent or mitigate adverse impacts because of their engagement is an important part of respecting their time and commitment. Many police forces have existing structures for feeding back on stakeholder engagement (such as 'you said, we did' structures, stakeholder forums such as the multi-agency rape strategic group) which would be an appropriate mechanism to use. Stakeholders are also likely to be a crucial part of monitoring impact mitigation measures. Discussions with stakeholders should also include reflecting on the process of the individual RVIA.



### 9.3 How do RVIA's contribute to accountability and continuous development for a police force?

All completed RVIA's should be reported to chief officers for consideration as to whether the RVIA has been completed effectively, as well as to contribute to ongoing learning around the force's response to sexual violence. RVIA's should be stored in a central and easily accessible place internally, as they may be valuable to individuals completing future RVIA's, or similar processes such as equality impact assessments, as well as to those developing policy, procedure and practice relating to RASSO victims in the future.

As a force conducts more RVIA's, there are opportunities for learning for the force by looking for patterns around challenges and strengths in their response to victims of sexual violence. There may also be patterns in terms of gaps in information available to the force.

RVIA's will provide a valuable resource for forces in terms of explaining their overall response to victims of sexual violence. RVIA's may be useful in relation to inspections or responding to FOI requests. RVIA's may also be useful in discussion with stakeholders, for example in discussions with PCCs around funding for third sector organisations where this is having an impact on the force response to victims.

### 9.3 Should RVIA's be published?

RVIA's should be published by default and, in the limited circumstances where this is not possible, shared with stakeholders.

#### RVIA's should be published by default

- RVIA's make an important contribution through publication to police transparency, enabling victims, stakeholders and the wider public to better understand police processes and constraints.
- Communicating clearly to stakeholders about the process and findings of an RVIA, including through reporting, is an essential step towards securing a transparent and accountable process.

- Victims and organisations report contributing to police reviews and initiatives but often not finding out outcomes or actions being taken, or why changes have not been introduced. Therefore, sharing the outcomes of RVIA's may enhance overall victim and public trust and confidence in the police.
- In terms of accessibility, police forces should note that written documents on websites are not easily accessed by all, and alternative formats (such as easy-read, BSL videos, captions on any video content) and alternative dissemination plans should be put in place where appropriate.
- It may be necessary to redact RVIA's before publication or sharing with stakeholders, for example where the RVIA includes information gathered from internal police colleagues or directly from victims where anonymity must be assured.
- RVIA's would normally fall to be published under Freedom of Information (FOI) requests and therefore publishing them by default saves the police force work in responding to requests.

#### RVIA's should be shared with stakeholder where it is not appropriate to publish

There may be times when the force and stakeholders agree that it is more appropriate for the RVIA to be shared with stakeholders but not fully published, because it contains particularly sensitive information. This may occur where there is concern that publication would affect investigations.

For example: if a force conducted an RVIA around a policy to arrest suspects earlier in RASSO investigations, with aims around accessing information from suspects' mobile devices rather than requiring this from victims, there might be concerns that publishing the RVIA would change suspects' behaviour, such that they deleted material from mobile phones before arrest.

- Another situation where it may be appropriate to share an RVIA with stakeholders, but not to publish more widely, is where a force is piloting a new policy, procedure and practice. In these circumstances, the force and stakeholders may agree to delay publishing the RVIA until the impacts of the pilot can be considered, to ensure robust and meaningful discussion around what the pilot has shown about impact on victims of sexual violence. It would be expected however that such an RVIA would be published later, on a date to be agreed with stakeholders.
- In limited circumstances it may be necessary to publish a summary of the RVIA, which includes an outline of the process, findings, mitigation measures, as well as a forward-looking plan for monitoring and evaluation, rather than the RVIA itself.

#### **Oversight of decisions not to publish the RVIA**

- In exceptional cases, it may be decided neither to publish the RVIA nor to share the RVIA with stakeholders. The reasons for doing this would need to be agreed with the multi-agency rape scrutiny group and chief officers.

