

ORIGINATOR: CHIEF CONSTABLE

PAPER NO: AP15/68

**SUBMITTED TO: ACCOUNTABILITY AND PERFORMANCE PANEL –
27 OCTOBER 2015**

SUBJECT: HMIC - A SERIES OF REPORTS INTO CHILD PROTECTION

SUMMARY:

1. This report outlines the recommendations arising from a series of three HMIC reports relating to child protection published in July 2015, their relevance within Suffolk and how the organisation is responding. The three reports are entitled:
 - **‘In harm’s way: the role of police in keeping children safe’** – a summary of findings from 21 inspections on the police response to child protection, conducted over the last two years;
 - **‘Online and on the edge: real risks in a virtual world’** – findings from an inspection of how police forces deal with children who are being exploited via the internet;
 - **‘Building the picture: an inspection of police information management’**- an examination of how successfully police share and cross check information in order to build a picture of criminality (this inspection is the result of findings in HMIC’s 2013 report into police failings in sharing and recording allegations related to Jimmy Savile).
2. A summary table of the recommendations is included at the end of this report.

RECOMMENDATION:

- 1 The Accountability and Performance Panel is asked to note the findings contained in the report.

1. KEY ISSUES FOR CONSIDERATION:

- 1.1 In July 2015 Her Majesty's Inspectorate of Constabulary (HMIC) published a series of three reports related to child protection inspection activity from the last 18 months, entitled;
- **In harm's way: the role of the police in keeping children safe** – a summary of findings from 21 inspections on the police response to child protection, conducted over the last two years;
 - **Online and on the edge: real risks in a virtual world** – findings from an inspection of how police forces deal with children who are being exploited via the internet;
 - **Building the picture: an inspection of police information management** – an examination of how successfully police share and cross check information in order to build a picture of criminality (this is the result of findings in HMIC's 2013 report into failings in sharing and recording allegations related to Jimmy Savile).
- 1.2 The overall message from the three reports is that the police service must reassess their approach to child protection or risk failing a new generation of children. The increasing number of cases involving child protection means that police will have to adapt to a substantial new challenge, with new ways of working. The findings from HMIC's child protection inspections demonstrate an under-recognition and under-estimation of risk. The current child protection arrangements, which deal with incidents on a case by case basis with their focus on procedures, may be inadequate for the task and different approaches may need to be considered - but this is not a matter for the police alone.
- 1.3 Locally the organisation is managing activity through action plans, to ensure that the force is dealing with the highest priority issues in the most effective way, mitigating identified risks and closing any gaps between identified best practise and current local policy and procedure.

In harm's way - the role of the police in keeping children safe

- 1.4 'In Harm's Way' is a thematic report based on eight child protection inspections of the following forces, Norfolk Constabulary, South Yorkshire Police, West Midlands Police, Greater Manchester Police, West Yorkshire Police, Nottinghamshire Police, Dyfed Powys Police and West Mercia Police, conducted between January 2014 and June 2015.
- 1.5 There are no specific mentions of Suffolk Constabulary within the report. The findings are generic and apply to all forces as a whole.
- 1.6 The scope of the report covers the extent and demand of child protection work; leadership and management; initial response; criminalising children for minor offences; information sharing with partner agencies; detention of children in police custody; enquiries and investigations; reducing the risk of harm; systems and processes; and relationships between the police and other agencies.
- 1.7 The findings can be summarised as follows
- Protecting vulnerable people is a priority for all forces and considerable resources have been allocated to this end, however forces are struggling to keep up with demand.

- The level of child abuse and neglect is so high that it is difficult to comprehend and responding on a case by case basis may be inadequate for the task.
 - The inspections found evidence of poor attitudes to vulnerable children and inadequate investigations with insufficient evidence gathered to apprehend and disrupt perpetrators.
 - Although progress has been made, HMIC believe that there must be a reappraisal of the role of policing in child protection, against shrinking resources, to ensure that all children receive the help they require.
 - Regular feedback to the police from partner agencies is required to ensure that protective measures are implemented and interventions are effective, particularly for children who are not subject of a case conference or do not appear in court.
 - Senior police officers to better understand what is happening on the ground. They also need to look more closely at the profiles of those processed through the criminal justice system to ensure that children do not suffer discrimination.
 - Specialist teams with more experienced staff perform better than other teams. As a matter of urgency, all officers should be able to effectively communicate with children, particularly those who struggle to express themselves or are resistant to police contact.
- 1.8 HMIC recommends that for future work analysis of the effectiveness of processes is undertaken before investing in resources. The anticipated growth in the number of reports and referrals needs to be managed, in discussion with partner agencies, and informed by the views and experiences of children.
- 1.9 There are 44 recommendations outlined in the report (see table below) and although none are specific to Suffolk they are applicable to all UK police forces. There are also opportunities to explore closer partnership working, ensuring a joined-up approach to child protection.
- 1.10 To date, Suffolk has not been inspected on child protection. HMIC have not yet provided notification of when this will take place although on the current programme, it is envisaged that this will happen in the last quarter of 2015. **The Detective Superintendent, Protecting Vulnerable People Directorate has been preparing for the inspection since April 2015 with the introduction of a working group, involving relevant stakeholders to assemble evidence in line with the methodology as well as reviewing recommendations from other force reports to identify and mitigate against any potential risk areas. Knowledge checks have also been carried out with police officers across Suffolk by the Joint Performance and Analysis Department (JPAD) in conjunction with Protecting Vulnerable People (PVP), to establish any gaps for further training and guidance.**
- 1.11 In May 2015, Suffolk was inspected on vulnerability as part of the PEEL effectiveness regime. The scope of the report included how effectively we deal with missing and absent children and those at risk of sexual exploitation. The Suffolk report will be published week commencing 14th December 2015. **An action plan has been developed with chief officers to address the issues raised within the hot debrief, which is being overseen by the Superintendent, Operations and the Detective Chief Inspector, Protecting Vulnerable People Directorate.**

Online and on the edge: Real risks in a virtual world

- 1.12 This report sets out the findings from the fieldwork in Devon and Cornwall, Kent, Lancashire, North Wales, Northumbria and Staffordshire. As this was a thematic inspection involving only six forces, Suffolk Constabulary will not be inspected on its response to online Child Sexual Exploitation (CSE) at this time (although the

vulnerability inspection earlier this year did involve this area) but it is anticipated that the findings and recommendations will be relevant for all police forces.

- 1.13 The report is set out in two sections, the first provides background information on areas including children living in an online world; the real world threat; the dark web; and the nature and scale of offending, as well as the police role in child protection. The second section covers the findings from the inspection process, the scope of which was the initial contact, assessment and help; investigation; quality of decision making; management of those posing a risk to children; leadership management and governance; and how effective is the police response to children who need protection.
- 1.14 Key findings of the report were that senior police leaders are committed to protecting children but there is a gap between the stated force priorities and the reality of practice on the ground. Despite the commitment of many officers and staff, the police response to children who have been victims of online sexual exploitation requires improvement.
- 1.15 In cases where police were dealing with an identified child or offender, opportunities to identify further offences or risks to other victims were not followed up. Also, offenders who posed a potential risk to children were released on bail for prolonged periods.
- 1.16 All forces experienced varying delays in investigations due to backlogs in the analysis of media devices in the high-tech crime units, with some delays as long as 12 months.
- 1.17 Some police forces issued cautions to offenders for online CSE which raised cause for concern, particularly in the absence of effective scrutiny arrangements.
- 1.18 Although there was considerable effort to provide advice and guidance on internet safety more could be done to warn children about the consequences of risky behaviour online. There were some good examples, however, where officers responded promptly, secured evidence sensitively and ensured any children at risk were adequately safeguarded.
- 1.19 HMIC concluded that the protection of children is a priority for all forces although they are 'taking a traditional policing approach to a 21st century problem'. Although internet related crime is increasing, a significant proportion is still not being reported. More work needs to be done to understand the nature of the risks and the scale of offending and only then can the police service analyse demand on resources and plan an effective response.
- 1.20 There are 13 recommendations arising from this report, which although are not specific to Suffolk, are relevant to all forces. HMIC will review police progress against the recommendations as part of their ongoing programme of national child protection inspections.
- 1.21 The College of Policing carried out a peer review of CSE in Suffolk in May 2015 with one overall recommendation arising: 'improve the management of CSE'. **An action plan has been developed as a result of the findings of the peer review, which is managed via the 'joint action plan tracker' by the Detective Superintendent, Protecting Vulnerable People Directorate.**

Building the picture: an inspection of police information management

- 1.22 In 2013 HMIC published its findings of a review into how the Metropolitan Police Service, Surrey Police and Sussex Police dealt with the information and allegations about the criminal sexual conduct of Jimmy Savile, which they received between 1964 and 2008. The report concluded that mistakes had been made in handling information and the failure to 'join the dots' inhibited a full understanding of Savile's criminality.
- 1.23 For this inspection, the objectives were to establish the following
- If force strategies, policies and procedures for information management adhere to the principles of the Authorised Professional Practise (APP) on information management;
 - If information and intelligence are captured, recorded, evaluated, acted upon, audited and retained by the police (including safeguarding interventions) in an effective way;
 - If the use of the Police National Database (PND) is effective and efficient.
- 1.24 HMIC analysed the results of a self-assessment survey on the management of information, which all forces¹ completed in 2013, and conducted fieldwork in 13 police forces. (Surrey, Sussex, MPS, West Yorks, Cambs, Humberside, Dyfed Powys, Hampshire, Lancs, Lincs, Merseyside, North Yorks, Notts). The 13 forces were chosen either because of their involvement in the Savile enquiry, the Bichard enquiry or there was a high, low or average level of risk identified from the self-assessment. Suffolk Constabulary was not one of the forces subject of inspection fieldwork in this case.
- 1.25 The fieldwork, undertaken between May and August 2014, examined how information is recorded, reviewed, retained and deleted in each force; the quality of data supplied to PND and whether the data was refreshed in a timely fashion; the process for inclusion and handling of sensitive information; and the ability of the force to automate the process of linking police information in line with APP guidance.
- The findings reported on a number of areas as outlined below:
- 1.26 Decisions to depart from the APP on information management were not being recorded by chief constables.
- 1.27 There is no direct link between PND and the Home Office Large Major Enquiry System (HOLMES) and information being gathered as part of major investigations is not available on PND, resulting in an incomplete picture being available to the wider police service. Similarly, there is no link between HOLMES and the National Special Branch Intelligence system.
- 1.28 Generally, information relating to allegations of corruption and misconduct / other complaints is kept on standalone systems within the Professional Standards departments. This information does not routinely feed into PND but work is ongoing to allow users to load data into a secure, restricted area of the PND.
- 1.29 Seven of the 13 inspected forces did not have an information management strategy in place. If forces are to make best use of information that is available to them and to protect the public from harm, the information management strategies should be as closely aligned as possible, using the APP guidance as a reference.

¹ Suffolk's response to this self-assessment can be found [here](#).

- 1.30 There were concerns about the practical day to day management of information, with only half of the 43 forces undertaking regular quality assurance audits. Forces should be monitoring the extent to which their officers comply with national guidance and local policies to ensure they are consistently reaching the required standard.
- 1.31 The self-assessment survey showed that some forces do not have processes in place to manage duplicate or potentially duplicate records. Also of concern to HMIC was that 13 forces do not have documented standards set out for inputting or recording of information about individuals. There was also inconsistency in the forces that make appropriate links between new and existing information, for instance, linking or referencing information on crime recording and custody records. There was also an issue highlighted whereby forces cannot reference all information held about an individual without accessing a number of different systems which put obstacles in the way of carrying out an ongoing assessment of risk.
- 1.32 Best practice was identified when grading intelligence in that the initial officer's assessment was reviewed by a colleague who had been trained in grading intelligence. There were some concerns, however, that 30 forces nationally were not comprehensively using the four categories to group intelligence identified in the APP guidance. The extent to which information was indexed also varied greatly across forces.
- 1.33 Ten of the forces that were inspected do not routinely adjust the original classification of a piece of information in the light of any new information. Those forces which used a dedicated information team, responsible for reviewing records and assessing the level of risk posed by an individual as a result of new information received had a much more informed approach to investigations, giving a greater level of consistency and confidence in the information.
- 1.34 HMIC were pleased to find that the vast majority of forces do make sure that information is transferred to PND in a thorough way.
- 1.35 During the inspection, it was found that guidance on the retention of information was not being uniformly and comprehensively applied. The self-assessment survey indicated that over half of all forces do not consider information about a person which comes from outside the force when making the decision about whether to retain records. This was of acute concern as individuals can quickly travel the breadth of the country and abroad.
- 1.36 HMIC found that as many as 30 forces were not undertaking initial reviews and although a full and timely information management review may not be practicable in every case, a minimum set of verification checks should be carried out. A full review should be carried out however, in more serious cases involving children and vulnerable adults.
- 1.37 For scheduled reviews, only 15 forces stated that they conducted these in compliance with the national guidance set out in the APP on information management. Six forces also indicated that they do not use the National Retention Assessment Criteria to reconsider the original classification of an item of information.
- 1.38 Twenty nine forces nationally indicated that they permit disposal of information based on a decision by one individual, which does not need to be approved by a line manager. Therefore the risk of inappropriate decisions being taken without a proper procedure for checking these decisions is clear. An example of good practice was shown by Hampshire who instigated a peer review process, in which decisions concerning higher risk records were considered by at least two experienced staff.

- 1.39 HMIC were concerned that in only four forces was there any forcewide policy setting out how sensitive information should be treated. Even in those four forces they did not find any evidence to show that compliance with the policy was being monitored to ensure it was being followed up.
- 1.40 There were clear tensions highlighted regarding sharing of sensitive information and it was a matter of material concern to note that this position does not appear to have improved since the Savile enquiry. Forces should devise a means by which sensitive information is recognised, assessed and appropriately transferred onto PND which can then be searched by others.
- 1.41 The report concluded that ‘a cornerstone of effective police investigations is a full, evidence based evaluation of the risk that an individual poses to the community which cannot be achieved without understanding all the information the police service holds as a whole about that person. That the understanding cannot be secured without effective systems in place to efficiently manage the information and without effective management of this information, harm will continue to be done.’
- 1.42 Key findings are summarised as follows:
- There is insufficient review taking place of the information that forces hold.
 - The evaluation and processing of information should be done on a priority basis according to risk.
 - Forces should develop a better integration between IT systems to allow for improved information share, particularly with sensitive information.
 - There is a need, particularly with information that has been marked as SENSITIVE for the police to review it to see whether such a classification remains appropriate as time passes.
 - Forces which maintained a central information management team were able to better adopt the principles of the APP information management guidance. This was especially evident where the teams had access to one integrated IT system to access all the information held on one individual.
 - Forces should consider how information is transferred from standalone systems such as HOLMES and PSD systems into PND.
- 1.43 HMIC will monitor the compliance with the APP on information management in order to encourage learning opportunities and sharing of best practice.
- 1.44 HMIC will check the implementation of the recommendations contained within this report and work with the College of Policing to design a focused inspection to determine what progress has been made.
- 1.45 Locally, there is a response to this report being formulated by the joint Head of Information Management, from which an action plan will be produced. The action plan will sit on the action plan tracker with progress monitored through the Joint Organisational Improvement Group (JOIG) meeting. One action will be to work with the AMO to set in place a process within Norfolk and Suffolk’s Athena structure to address the recommendations identified in this report.**
- 1.46 Andy Begent, Chair of the Athena Information Management Group (IMG) has written a paper to provide the Business Design Authority (BDA) with an overview of the potential impact of the report on Athena and provides three recommendations for the BDA’s consideration. The progress on the recommendations contained within this report which apply to ATHENA are contained within the briefing ‘HMIC Building the Picture Inspection and ATHENA’.**

1.47 Further responses to these recommendations will be collected from intelligence investigations and safeguarding and collated by the Joint Head of Information Management to provide a response to HMIC.

2. FINANCIAL IMPLICATIONS

2.1. There are no financial implications.

3. OTHER IMPLICATIONS AND RISKS

3.1. There are no other implications or risks.

Summary Table of Recommendations

Report	Recommendation
In harm's way - CSE	Better force plans to disrupt and prosecute perpetrators
In harm's way - CSE	Better staff awareness and understanding, including understanding of police staff of responsibilities to protect children
In harm's way - CSE	Better staff understanding of the links between missing from home and CSE and police responsibilities for missing children
In harm's way - DA	Improve staff awareness and understanding of the impact of long standing DA on children (and the importance of good risk assessments)
In harm's way - DA	Improve collation, exchange of information with other agencies and oversight of assessments
In harm's way - DA	Ensure full information including previous incident details of all family members are available for meetings
In harm's way - DA	Ensure plans identify what action the police can take to safeguard children for the future
In harm's way - DA	Improve recording of the views and concerns of children including their behaviour and demeanour, to inform assessments
In harm's way – looked after children	Review arrangements to safeguard children in care homes especially those at risk of CSE
In harm's way – looked after children	Ensure children who are looked after are not refused accommodation by the local authority and ensure alternative accommodation is provided for those children who would otherwise be remanded in custody
In harm's way – looked after children	Work with local authorities to avoid the arrest and detention of looked after young people who are disruptive in their children' home
In harm's way – child detention	That staff act within the law and detain only those who need to be detained and for the minimum amount of time
In harm's way – child detention	Meet the statutory requirement to complete and present to court a child detention certificate to explain the necessity of police detention
In harm's way – child detention	Meet the welfare needs of children in custody including the provision of food and drink
In harm's way – child detention	Improve staff awareness of child vulnerability and assessing needs
In harm's way – child detention	Engage families better in helping a child meet their bail conditions

In harm's way – child detention	Ensure children have an appropriate adult who can advocate on their behalf
In harm's way – child detention	Ensure early assessment of likely need for alternative accommodation and early consultation with children's social care services
In harm's way – child detention	Ensure all looked after children are not refused accommodation by the local authority for whom they are responsible
In harm's way – all children	Better communication and engagement with children
In harm's way – all children	Record children's needs and views and ensure they inform individual and corporate plans
In harm's way – all children	Keep children and their families informed about what is happening in their case
In harm's way – all children	In child protection plans identify a range of responses and action that police can take
In harm's way – all children	Record what action is to be taken and action that has been taken
In harm's way – investigations	Set forcewide standards for investigation implement and quality assure them
In harm's way – investigations	Improve investigation skills
In harm's way – investigations	Supervise and audit investigations
In harm's way – delay	Speed up analysis of computers in high-tech crime unit
In harm's way – delay	Review child protection investigations that are outstanding to ensure children are not at risk or have been protected in the interim
In harm's way – delay	Improve timeliness of information sharing between police and other agencies
In harm's way – delay	Monitor and improve timeliness of case reviews and charging decisions with the CPS
In harm's way – decision making and recording	Ensure staff have access to relevant information such as an offender being on the sex offender register or children being on a child protection plan as they make first contact
In harm's way – decision making and recording	Improve recording (accuracy, content, timeliness) and the management and retention of records
In harm's way – decision making and recording	Ensure records include history of abuse, number of children in the family before decisions are made at multi-agency risk assessment conferences
In harm's way – decision making and recording	Quality assure records
In harm's way – decision making and recording	Ensure all decisions actions and discussions are recorded by joint investigation teams
In harm's way – decision making and recording	Use all relevant police information in undertaking risk assessments
In harm's way – decision making and recording	Improve skills in drawing together information and forming an assessment

In harm's way – leadership and management	Better oversight of work
In harm's way – leadership and management	Quality assurance checks on all aspects of work
In harm's way – leadership and management	Ensure consistency and quality of response irrespective of the team to which a case is allocated
In harm's way – leadership and management	Review how new approaches are meeting objectives including MASH and MARAC and CSE teams
In harm's way – leadership and management	Resolve problems that require an inter-agency focus especially child detention
In harm's way – leadership and management	Gather information and report on outcomes of police involvement
Online and on the edge	Within six months, forces ensure relevant officers have access to social media applications to facilitate initial enquiries about a child's online activity as a means of supporting and prioritising the early stages of investigations
Online and on the edge	Within nine months, forces review the management of online child exploitation investigations with a view to identifying wider safeguarding opportunities and implementing any changes of practice that are necessary
Online and on the edge	Within six months the national policing lead provides guidance on the management of digital forensic analysis so that cases are prioritised effectively and in accordance with the risks that pertain to the children involved
Online and on the edge	Within nine months forces review the management and supervision of online child sexual exploitation investigations to ensure that time delays are reduced and that safeguarding measures are identified, prioritised and dealt with in a timely fashion and in the best interests of the child
Online and on the edge	We recommend that, within three months, forces review tenure policies and succession planning in order to maintain and improve staff well-being.
Online and on the edge	Within six months chief constables ensure that those staff involved in online child sexual exploitation investigations have a positive working environment and are properly supported through effective supervisory support and welfare management
Online and on the edge	Within nine months forces ensure that those who are involved in and supervise online CSE investigations are able to access relevant information as and when required maximising the use of current and planned IT systems
Online and on the edge	Within three months forces ensure that decisions to use out of court disposals in relation to online CSE are systematically scrutinised with a view to improving practice and minimising the opportunities for the inappropriate administration of alternatives to criminal proceedings at court
Online and on the edge	Within six months forces review existing processes for categorising risk in order to ensure that risks to children are being assessed effectively and appropriate measures taken to prevent and reduce offending

Online and on the edge	Within six months forces review their approach to online CSE with a view to ensuring problem profiles use an evidence based methodology to establish the nature and scale of offending and making better use of research to improve understanding of risks and to identify desirable outcomes for children
Online and on the edge	Within six months forces review their methods for allocating online CSE investigations taking account of the seriousness and complexity of each case and the skills and the experience of the investigating staff
Online and on the edge	Within 12 months forces working with the national policing lead consider ways to ensure that a good practice regime is introduced supervised and monitored in forces so that children are protected
Online and on the edge	Within six months forces consider and implement ways to improve communications with children by making better use of social media channels so that children are better able to protect themselves online
Building the picture	By 30 November 2015 chief constables should ensure that a review is undertaken of the way in which their forces' information management policies and practice comply with the APP on information management so that they give effect to the national approach and minimise any divergence from that APP
Building the picture	By 30 November 2015 chief constables should carry out systematic audits in their forces to identify the extent to which locally adopted practices and procedures conform to the APP on information management
Building the picture	By November 2015 chief constables should ensure that adequate local information management processes are in place to consider all available information in an efficient and systematic way so that the continuing levels of risk that individuals pose to communities are properly assessed and where necessary information is recategorised and linked
Building the picture	By November 2015 chief constables should ensure that their local information management processed adequately identify and prioritise the records of those who pose the greatest risk in order that they are properly monitored and appropriate timely action is taken
Building the picture	By 30 November 2015 chief constables should put in place arrangements to scrutinise audits of compliance with the APP on information management through the force information management governance structure. This should include measures to ensure that categorisation of records are regularly adjusted
Building the picture	Immediately chief constables should make sure that their force information records are reviewed at the end of the review period set for each information grouping and records created when decisions are made to retain information beyond the applicable period of retention

ORIGINATOR CHECKLIST (MUST BE COMPLETED)	PLEASE STATE 'YES' OR 'NO'
Has legal advice been sought on this submission?	NO
Has the PCC's Chief Finance Officer been consulted?	NO
Have equality, diversity and human rights implications been considered including equality analysis, as appropriate?	YES
Have human resource implications been considered?	YES
Is the recommendation consistent with the objectives in the Police and Crime Plan?	YES
Has consultation been undertaken with people or agencies likely to be affected by the recommendation?	NO
Has communications advice been sought on areas of likely media interest and how they might be managed?	NO
Have all relevant ethical factors been taken into consideration in developing this submission?	NO