

The Rt Hon Suella Braverman KC MP
Home Secretary
Home Office
2 Marsham Street
London

Our ref:TP/VS

16 February 2023

Dear Home Secretary

RE: HMICFRS – National Child Protection Inspection Report for Suffolk Constabulary.

Thank you for the opportunity to comment on this inspection. Suffolk Constabulary has provided a thorough update on the recommendations, which is attached and will be published on my website.

The Constabulary's response will also be considered at my public Accountability and Performance Panel meeting in March 2023.

Yours sincerely



Tim Passmore, Police and Crime Commissioner for Suffolk

Subject	HMICFRS National Child Protection Inspection Report for Suffolk Constabulary – published 22nd December 2022
Date	12/02/2023
PURPOSE	To provide an update on behalf of Suffolk Constabulary in response to recommendations in the above report.
PREPARED BY	T/DCS Andy Smith – Head of Crime, Safeguarding and Incident Management
COMMISSIONED BY	Not Applicable

1) INTRODUCTION

This report seeks to provide a formal outline of the constabulary's response to key recommendations arising out of an HMICFRS inspection of Suffolk Constabulary child protection capabilities, conducted between 18th and 29th July 2022.

During this inspection HMICFRS examined how effective the police's decisions were at each stage of their interactions with or for children. This was from initial contact through to the investigation of offences against them. HMICFRS also scrutinised how the force treated children in custody and assessed how the force is structured, led and governed, in relation to its child protection services.

The findings of this nationally governed child protection inspection (NCPI) were published by the HMICFRS on 22nd December 2022.

This NCPI report, positively recognised Suffolk Constabulary as having a number of strengths relative to its child protection capabilities, most notably: -

- A committed and enthusiastic workforce, with a clear focus on the voice of the child.
- Good Practice evident in response to children involved in incidents where children require immediate protection.
- Well established partnership arrangements, including a well-established Multi Agency Safeguarding Hub.
- High-quality multi-agency child protection investigations.
- Good multi agency management of sex offenders.
- Good care and treatment of detained children.

Whilst recognising these strengths, the NCPI findings also identified some areas for improvement, resulting in ten recommendations for the constabulary to consider and act upon. Four of these recommendations required the constabulary to take immediate action.

2) UPDATE IN RESPONSE TO RECOMMENDATIONS

The following updates have been provided to HMICFRS in response to ten recommendations

Recommendation 1

That Suffolk Constabulary immediately works with its statutory safeguarding partners to resolve problems that are reducing the effectiveness of multi-agency arrangements to safeguard children.

Response to Recommendation 1

In mid-September 2022, Suffolk Constabulary sought to strengthen current escalation processes and introduced an escalation register for recording safeguarding issues which is managed by the operational lead for safeguarding (D/Superintendent CSIM command). This process captures safeguarding service delivery issues across all commands and allows for the appropriate recording and tracking of escalation to partners and associated outcomes. This process is also used by safeguarding partners to raise any concerns relative to police service delivery. Safeguarding problems will continue to be escalated to the Suffolk Safeguarding Partnership (SSP) board, with established processes in place for reviewing cases factoring in information collectively from all partner agencies (rapid review process). Oversight of recurring or unresolved problems will be raised at the Suffolk Safeguarding Partnership Executive Board.

Examples of problems cited by HMICFRS are being addressed in conjunction with partner agencies and updates are provided in this report relative to plans to address recurring issues, notably that highlighted with regards to local authority provision of emergency accommodation and foster carers children's' homes compliance with the Philomena protocol and expediency of local authority return home interviews (missing children).

HMICFRS have also been updated as to the constabulary working closely with mental health partners to address high levels of demand which adversely impacts on the Constabulary. Examples of which were given as the use of a strategic level bimonthly meeting held with the operations director for Norfolk and Suffolk Foundation Trust (NSFT) and the increasing use of data to support escalation of concerns to seek changes or improvement in service delivery. Suffolk's chief officers also continue to hold regular discussions with NSFT leaders to address any concerns in partnership working.

An update on the findings of this inspection, problems identified by HMICFRS and key requirements for support were presented by the Chief Constable and the head of crime and safeguarding to the Suffolk Safeguarding Partnership Executive board on 3rd February 2023.

The strengthening of escalation processes as outlined together with well-established partnership working and demonstrable progress against problems identified by the HMICFRS should enable the constabulary to prove it has responded in full to this recommendation.

Recommendation 2

That Suffolk Constabulary immediately improves its arrangements and practices for responding to incidents of missing children This should include:

- Having regard to the college of policing Authorise professional Practice,
- Using the Philomena protocol,
- Improving risk assessment for missing children,
- Improving the way, it supervises responses and,
- Improving the way, it collects and uses information to prevent incidents of missing children.

Response to Recommendation 2

Oversight & Co-ordination to drive improvement

An internal review of the response to missing people focusing on children in particular, has been completed and the Constabulary has a documented continuous improvement plan with accountability for delivery via a missing improvement panel. This panel also monitors, and shares updated guidance and information concerning missing, such as for example the recent NPCC guidance relating to adult migrants and children missing from care, duties and powers when a missing person is found.

The Constabulary has responded specifically to the HMICFRS recommendations through a task and finish working group to drive immediate recommended areas for improvement. This group consists of the Constabulary's Missing Person Advisors, Subject Matter Expert, ICT representative and the departmental head for the Crime Coordination Centre. Progress has been recorded using an actions tracker document.

College of Policing Authorised Professional Practice (APP)

The Constabularies joint missing policy with Norfolk has been reviewed and re-written to ensure alignment with the College of Policing APP for missing. This is going through final stages of formal consultation but has been adopted in draft and published at the beginning of February 2023, following approval by Deputy Chief Constables for both constabularies. As part of this policy rewrite, Suffolk Constabulary sought and received positive feedback from HMICFRS that enables us to implement revised policy with confidence that it addresses NCPI concerns. Communications have been sent across the constabulary to ensure compliance with this new policy and reality testing and audit will follow.

Using the Philomena protocol.

The Philomena protocol is a scheme that asks carers to identify children and young people who are at risk of going missing and to record vital information about them that can be used to help find them quickly and safely.

The Philomena form has been revised and circulated to stakeholders. The Constabulary's Missing Person Advisors are visiting care providers across the county to promote adoption and to review protocols with each and are providing guidance and training where requested. Cases of non-adoption are being documented for further escalation to Suffolk County Council. OFSTED, Suffolk County Council Missing Co-ordinator and Children and Young Persons manager have all been engaged and are supportive of seeking to address non-compliance. The Head of CSIM has signed off on correspondence which has been sent to key external stakeholders to promote the revised protocol and to ensure that care providers discharge basic parental responsibilities to help locate missing children as opposed to immediately defaulting to calling police.

Suffolk Constabulary has engaged the charity 'MISSING' and are in the process of arranging a multi-agency conference to further discussions, obtain pledges, improve responses to both missing children and adults in Suffolk, enhance and promote a multi-agency and focus upon a child centred approach to missing.

Training

College of Policing designed Risk Management training is actively being delivered force wide, which includes direct reference to missing person incidents and providing an input on guidance on recording professional rationale as part of reviews and use of the College of Policing "10 Principles of Risk". It also addresses the language used historically us by supervisors, addressing potential to "victim blame" and the neuroscience of trauma. The use of risk review templates on COMPACT are being promoted, future changes to COMPACT including the removal of narrative will mandate this.

In addition to risk management training, "Stripes" training for newly promoted front line supervisors includes a bespoke input on missing, providing details on risk assessments, review and supervisory responsibilities.

COMPACT superuser training has been provided by WPC (COMPACT system provider) to 24 staff across the Constabulary who will disseminate knowledge and support standard users. A superuser forum will be created to maintain momentum regarding the use and development of the COMPACT system and improve risk management and standards of investigation. The Constabulary is seeking to provide enhancement to the way in which it utilises COMPACT including additional functionality such as document inclusion to provide ready access to investigating staff and officers.

Process Improvements

Fast action response plans and Athena briefings are being considered, utilised, and reviewed within a set format of implementation and review. These are linked to internal and external force processes and records maintained by the Missing Person Advisors within the Continuous Improvement Panel Microsoft Teams Channel.

Suffolk Contact & Control room now has a dedicated Inspector Single Point of Contact for missing who actively reviews CCR response to improve effective early risk assessment, implementing supervisor reviews for compliance with APP before COMPACT creation and deployment of resources. The CCR has also implemented a new process to ensure the definition of missing is strictly applied and ratify the initial risk to all reports to ensure that an appropriate police response is delivered in keeping with APP. CCR Supervisors are also receiving training on Missing, highlighting the "Continuum of Risk", the

“Model of Intervention” and the requirement to holistically review reported missing persons to fully understand their associated risk.

The Child Abduction Warning Notice policy and bespoke guidance has been revised with forms recorded on Athena allowing ready access for operational staff. This has resulted in an evident increase in their use by officers. This will continue to be monitored to ensure adoption and use to protect vulnerable children.

The Constabulary is exploring an enhancement to the Op Encompass process to include the sharing of missing episodes with educational establishments. Early response from key partners has been positive and it is hoped that this will be introduced within the next 3 months.

A review of how repeat missing children are flagged and supported through multi-agency coordination has been mapped to ensure that those most at risk receive appropriate support.

Whilst improvement work is ongoing in response to this recommendation, the nature and scale of work undertaken already is such that significant progress has been made in respect of making necessary improvements to our response to missing children.

Recommendation 3

That Suffolk Constabulary immediately reviews its risk assessment and information-sharing practices so it can: -

- Identify vulnerable children at the earliest possible stage,
- Identify those who are a risk to children,
- Assess what immediate action it needs to take to safeguard these children and,
- Refer children without delay to the most appropriate level of support.

Response to Recommendation 3

The constabulary has continued to track the performance around capturing, recording, and reacting to the voice of the child from the first contact with the constabulary (CCR) through to officers attending incidents, and recording this. Where required, a “PVP” (child protection investigation) is recorded, and these are triaged by the police MASH team. The importance of capturing the voice of the child is repeated frequently and this includes as part of investigation standards included as part of mandatory two-day training being delivered for all sergeant and inspectors taking place from the end of January 2023.

In addition, following our inspection in July 2022 the Constabulary launched its #aretheysafe campaign to promote vigilance amongst communities including businesses and encouraging members of the public to be professionally curious and report concerns to police to help us identify vulnerable children

as early as possible. These are referred to as “third party referrals” through the MASH and all are considered from a child safeguarding perspective.

The processes within the MASH have been developed so that children services as well as police decision makers look at individual cases and the history of individuals via research on systems to allow any historic information to be considered together with the recent report to allow greater context to be considered.

Cases which are triaged by the police MASH and RAG rated as red are sent to the Customer First team for urgent considerations and the anticipated turnaround time for review is wherever possible 4 hours.

Every case within the MASH is now being reviewed against the Police National Database (PND), so that all parties involved are checked against the PND to review information and intelligence held by other forces and factor any findings into localised decision making and risk assessments.

A quarterly meeting is held within the MASH which is attended by the three CYPS County Safeguarding Managers, the CSIM safeguarding D/Chief Inspector and the MASH D/Inspector in these meetings joint working practices are discussed and any emerging issues addressed.

To aid the better identification of those who pose a risk to children, and following negotiation with MASH CYPS Managers, Domestic Abuse (DA) incidents with children under the age of 5 are now being shared with CYPS regardless of risk level. Children under the age of 5 may not be in statutory education settings and may have no other professional eyes on them, hence this decision.

Standard risk DA is now being shared with CYPS where there have been 3 standard incidents in the last 12 months which mirrors CYPS multiple contact review criteria. All DA regardless of risk is shared with CYPS where the child is an open case, with schools via Op Encompass and with NHS Child Health Safeguarding by MASH police. Refresher training with MASH Decision Makers around DA cases has been undertaken and updated guidance issued.

A weekly audit is conducted to review cases not shared with CYPS and feedback passed to staff. CYPS do not have the capacity to take referrals for all standard risk DA. The January 2023 audit of standard risk DA reveals referrals only being shared with NHS Child health has decreased since updated guidance was issued and training in November as follows: This has resulted in an increase of standard risk DA referrals being sent to CYPS MASH.

An additional process change is that all registered sex offenders (RSO's) managed by the Public Protection Unit (PPU) now have a marker placed on their home address on the control room's “storm” system. This will not only flag up within the control room when an incident is logged at that address, but also when an incident is logged in the proximity of that address. This information is communicated to staff to highlight the location and the marker to better inform risk, and the fact that an incident has taken place to trip the marker is also notified to the PPU team for their research and further review if required.

An audit and refresher training with MASH Decision Makers has been completed by the MASH D/Inspector and updated Blue Brag guidance has been issued, reinforcing that all DA, Child Sexual Exploitation (CSE), Child Exploitation (CE), and missing child cases are mandatory to share with CYPS. Compliance will be monitored through existing audits.



An Athena search has been created to isolate all Child Protection Incidents from the total monthly blue brag with the expectation that a reduction in Athena records being 'blued' will be clear. This search was not previously built so the previous data provided to HMIC was a mix of records with both API and CPI classification which may not have been realised and could have been misleading. This training and practice change has contributed to a positive shift around delays in the MASH escalating interventions for some children known to be at risk of criminal exploitation and CSE.

In order to address the recording issues around ethnicity of children the force has published an article around cultural competency on internal systems which was signposted via force orders, and there is also ongoing HBA training being delivered by MASH staff, part of which ensured the recording of ethnicity is highlighted as a key piece of data quality requirements.

The constabulary has constructed a new Exploitation Policy, which encompasses Child Criminal Exploitation, and Child Sexual Exploitation (CCE & CSE) and the associated recording and investigation of such offences. It was recognised that previously there was little clarity around the recording and allocation of these investigations and the approach was not consistent. The policy is clear in that all CCE investigations will be reviewed by a CID D/Sgt for investigative opportunities and a decision around onward allocation, and similarly all CSE investigations will be reviewed by an SIU D/Sgt for investigative opportunities and a decision around onward allocation. Depending on levels of threat harm and risk will depend on allocation and ownership.

Information sharing processes amongst partner agencies are well established and, when required, carried out in a dynamic manner to inform acute safeguarding issues and decisions – this includes out of hours issues amongst front line professionals. The Suffolk Safeguarding Partnership has an ongoing workstream to review and collate all information sharing forms, agreements, and protocols from key local partner agencies to establish a common and more streamlined approach.

As stated, College of Policing approved Risk Management training is currently being provided Force wide, which includes direct reference to missing children and provides guidance on recording professional rationale as part of missing person reviews and uses the College of Policing “10 Principles of Risk”. It also addresses the language used historically by supervisors, addressing the potential to “victim blame” and the neuroscience of trauma.

The Power-Bi analytical product relating to Vulnerability Victim Offender Location data (V-VOL) is now a well embedded product across the force and is updated daily. This allows officers and staff to drill down to local issues by filtering victim offender and location information and is focussed on a risk scoring matrix, the Cambridge Crime Harm Index (CCHI), and is used to aid Tasking and Co-Ordination meetings when considering resource allocations to address issues. The importance of using V-VOL has been reinforced as a local policing priority. The constabulary has reviewed its Operation COMFORT DA perpetrator initiative to ensure consistency in approach for managing the highest risk DA perpetrators and V-VOL is central to this process.

In summary, the constabulary can demonstrate immediate action and progress towards meeting this recommendation.

Recommendation 4

That Suffolk Constabulary immediately establishes clear guidance for its responses to online child abuse and makes sure these responses are effectively supervised. This is so its workforce knows: -

- How to secure, preserve and remove indecent images of children on digital media,
- Which team is responsible for investigating online child abuse offences,
- How and when to get specialist help and advice, and,
- To consider wider safeguarding for all children affected.

Response to Recommendation 4

The following remedial action has been taken:

1. A detailed standard operating procedure (SOP) has been created for Youth Produced Sexual Imagery which provides the workforce with clear guidance around the points raised by the HMIC.
2. A flowchart has been created outlining the response to both experimental and aggravated cases to be used as a simple guidance document.
3. A guidance for parents' leaflet has been produced giving details of how to delete images and requesting removal from online platforms.
4. A Youth Generated Image Disclaimer has been produced for cases where no further action is taken.
5. A scenario-based guidance document has been produced explaining our investigative response in easy-to-follow steps.

The aforementioned documents will be published on the CSIM command intranet pages, the force Learning Management System and circulated to County Policing Command colleagues so they are aware of their roles and responsibilities. A HMIC bulletin will be published w/c 13th March which will include a scenario-based example and step by step guidance of how to respond and when to seize devices and remove imagery.

In order to produce the new Suffolk SOP and associated guidance documents a benchmarking request was sent to all 43 Forces requesting local policy documents and SOP's. 6 Forces responded and provided material which was reviewed in conjunction with the college of Policing APP on Self-Produced Sexual Imagery.

The NPCC information on Self-Produced Sexual Imagery was also reviewed which assisted with producing the 'advice for parents' leaflet.

Crimes falling into this category will be subject of future audits to ensure compliance with standard operating procedures as outlined.

In summary, the constabulary can demonstrate it has taken immediate action to address this recommendation.

Recommendation 5

That within three months, Suffolk Constabulary reviews how it collects, assesses, and uses information about crime, vulnerability, and risk. This is to make sure leaders and managers have good-quality information to prioritise safeguarding measures to reduce risk for vulnerable children.

Response to Recommendation 5

The constabulary has commenced reviews of processes for collection, assessment and use of information about crime, vulnerability and risk to improve safeguarding activity. Key areas of activity are summarised as follows: -

Analysis and Data reporting

The constabulary has continued to make progress in developing analytical products which ensure that good quality information is available to inform effective safeguarding activity. These analytical products are informed and kept under review through the child protection delivery governance board.

Child Protection Performance Dashboard

A Child Protection Performance Dashboard has been developed which provides real time data (updated daily) to show force performance across multiple areas of Child Protection. The dashboard includes child victim and child suspect data inclusive of volumes of crime, outcomes 1-8, key outcomes (15, 16, 18 & 20), live investigations, repeat victim data, and data showing area-based performance relative to voice of the child recordings. This dashboard gives a better understanding of the issues affecting children and young people and allows the force a better visual overview enhancing its ability to review and report on performance more easily. This data is presented on a monthly basis to the child protection delivery board. Steps are being taken to incorporate data concerning missing children and further review of any additional data collection gaps and reporting requirements is being undertaken.

Custody Performance Dashboard

The custody Power-Bi dashboard provides by way of real time data (updated daily) custody performance across Suffolk (and Norfolk), with metrics enabling scrutiny of performance relevant to safeguarding of children including throughput, disposal, waiting times, detention times, drug testing, hospital visits, use of force, strip searches and inspector reviews.

Child Protection Strategic Profile

Since the NCPI the Constabulary has completed a Child Protection Strategic Profile which has created a better understanding of the issues affecting children and young people as it has provided an in-depth analysis around the demographics of victims and offenders and how the constabulary manages those involved. Actions arising out of this profile are being managed by the Child Protection delivery board.

Tasking and Co-Ordination Processes

The Constabulary Tasking and Co-Ordination Group (TCG) processes, includes a Vulnerability TCG managed by CSIM. The SBOS analytical team scan for issues of vulnerability and bring these cases to the vulnerability TCG for discussion and agreement regarding prioritisation, allocation, ownership of the issue, and next steps around resources, safeguarding, and enforcement. In addition, the SBOS team make direct contact with safeguarding D/Inspectors and the MASH D/Inspector in advance to establish whether there are any cases which need to be brought to the vulnerability TCG for further action and consideration of referral to force tasking to bid for additional resource and support where required.

Force TCG

The constabulary's force tasking process continues to prioritise operations based on threat, risk and harm and vulnerability of victims including children at risk of or suspected as being exploited are prioritised.

Force Daily Management Meetings (FDMM)

The constabulary FDMM is managed via Microsoft teams with an associated channel and chat log. Each day the control room update this log with Suffolk Daily Crime List excel document – this provides the list of crimes in the last 24 hours across the force and can be filtered by policing command area, town, and offence type. In relation to domestic offences, the risk assessment level is also recorded. This document is available to all staff and managers linked to the FDMM chat and affords an opportunity to prioritise any cases for review in addition to wider investigation searches via Athena.

Operation Comfort – DA perpetrators

The constabulary has recently completed a review of Operation Comfort. This is the Constabulary's response to identifying, monitoring, and disrupting the county's highest risk domestic abuse perpetrators who, in a domestic setting, pose an ongoing and immediate risk to others through their offending behaviour. The meetings are held across the three policing areas and are in place to create opportunities for perpetrator interventions to reduce the risk of such individuals committing further offences involving domestic abuse. The terms of reference, attendance and agenda for Operation Comfort have been reviewed and re-built to bring parity in approach across the three policing areas and improve effectiveness through ownership, best use of tactical options and greater monitoring of progress through the constabulary's DA delivery board.

Vulnerability – Victim Offender Location data (analytical product) will be used to inform which DA nominals present highest risk and to ensure effective management of these through Op Comfort.

MASH process

The Constabulary has responded to HMICFRS feedback and introduced a process into the MASH whereby PND is used to search information and intelligence held by other forces to greater inform the situation and context for cases which come into the MASH for assessment, research, and decisions. This additional research adds an additional layer of checking and therefore greater informs risk – this wider information is shared with partners within the MASH where necessary for those partners' additional benefit around decision making. This approach supports teams being able to prioritise safeguarding measures to reduce risk for vulnerable children.

The information flow processes within the MASH between Police and partners have also been reviewed in detail and tightened up. These reviews have created a greater volume of information between agencies, particularly relating to incidents assessed as lower risk, providing a greater strategic overview of risk processed at all levels within the MASH.

Child Exploitation improvement work

The constabulary has reviewed and introduced a significantly revised Exploitation Policy, which encompasses Child Criminal Exploitation, and Child Sexual Exploitation (CCE & CSE) and the associated recording and investigation of such offences. It was recognised that previously there was limited clarity around the recording and allocation of these investigations and the approach was not consistent. The policy is clear in that all CCE investigations will be reviewed by a CID DS for investigative opportunities and a decision around onward allocation, and similarly all CSE investigations will be reviewed by an SIU DS for investigative opportunities and a decision around onward allocation. Depending on levels of threat harm and risk will depend on allocation and ownership. This policy will provide a clear and unambiguous route for review and allocation of investigations which are recorded, with all investigations having a PIP2 DS review at an early stage. This will bring a more effective system wide approach to CCE and CSE investigations and afford greater management oversight of the force's approaches to these investigations, as well as providing the clarity and expectations from the investigating officers and teams' roles.

MACE meeting processes are subject to ongoing review and a key element of this will be best use of intelligence and information to identify and prioritise against threat, risk and harm / vulnerability.

Missing Person Improvement work

(See response to recommendation 2)

Training

In addition to risk management training and training provided to supervisors and Inspectors as outlined, the CCR has a regular programme of training including refresher training regarding core areas of business. Call handlers within the control room have access to a range of different systems to support establishing details about incidents. This does not provide a training level to the equivalent of an intelligence trained development officer (IDO), but the CCR can access an IDO during core hours for intelligence research and development.

The Suffolk Safeguarding Partnership (SSP) has fully embedded the national "rapid review" process in relation to both children and adult cases. All agencies within the partnership provide a succinct overview of the detail held which is then collated and presented at the relevant subgroup for scrutiny and decisions around next steps to be taken within the partnership.

Recommendation 6

That Suffolk Constabulary works with its safeguarding partners and reviews the terms of reference and practices of all its multi-agency risk-management meetings, including those for children at risk of exploitation and domestic abuse and those who go missing from home.

Response to Recommendation 6

The Suffolk Safeguarding Partnership (SSP) is key to bringing safeguarding partners together across a range of meetings and subgroups. This cultivates a true culture of working together to collectively manage and address safeguarding issues across the county.

Operational meetings which partners attend include the following: MARAC, MACE, Missing TCG, as well as daily strategy meetings, and initial child protection conferences.

The terms of reference and approaches to these meetings form part of the “Working Together to Safeguard Children” Government guide published in 2018.

A new safeguarding partnership manager has been recruited (Jan 23) and the Det Supt CSIM line manages this role affording enhanced opportunities for positive influence from the Constabulary into the partnership. The safeguarding subgroups will be subject to a review in relation to terms of reference. attendees and practices supported by the new manager to ensure all groups are operating effectively.

Multi Agency Risk Assessment Conference (MARAC)

The terms of reference of each MARAC are currently :

- 1) share information to increase the safety, health and wellbeing of victims – adults and their children.
- 2) To determine whether the perpetrator poses a significant risk to any particular individual or to the general community.
- 3) To construct jointly and implement a risk management plan that provides professional support to all those at risk and that reduces the risk of harm.
- 4) To reduce repeat victimisation.
- 5) To improve agency accountability; and
- 6) Improve support for staff involved in high risk DV cases.

All representatives from the organisations are aware that their respective agencies are accountable for the acceptance and management of risk, and that this will not be held by MARAC.

Importantly MARAC process is subject to active review, and this will include suitability of its Terms of Reference

Multi Agency Child Exploitation (MACE)

The Multi Agency Child Exploitation (MACE) Panels are the forum for recognising and responding to children and vulnerable individuals at risk of exploitation, as either a victim or perpetrator, within a partnership arena. The panels provide strategic and operational oversight of children and adolescents up to the age of 24 in Suffolk who have been identified as being at risk of or are experiencing exploitation in any, and all its forms. As part of this the MACE Panel will attempt to identify perpetrators and disrupt their activities.

The Multi Agency Criminal Exploitation meetings are held monthly across the three geographic areas of the county and involve partner. The MACE panel will discuss and decide ownership and operational action to be taken by the respective partner agencies working together to safeguard and divert individuals from harm, and to disrupt perpetrators, and includes attendance from the manager from the newly formed criminal exploitation hubs.

The constabulary and the local authority are reviewing the terms of reference and process for MACE to improve the effectiveness and focus of these meetings. The new terms of reference are not finalised at the time of writing, but this is under development and will be finalised, published and embedded over the following quarter.

Missing TCG

The Missing TCG process is held monthly and is co-chaired between the police and the Local Authority County Safeguarding Manager.

This process is designed to capture those repeat missing children who perhaps haven't been supported via other means, but where a risk is recognised. The purpose of the meeting is to provide a multi-agency forum to discuss the current provision and future actions around care and support for the child, as well as to reduce the missing episodes and the associated risks thereby providing opportunities for bespoke teams to engage with each child where possible.

In addition, details of children can be captured in these meetings and taken to either the local MACE meeting, CSIM vulnerability TCG and area TCG's for wider ownership and actions/awareness.

This is a well-attended meeting which has been established for some time and again terms of reference and effectiveness will be reviewed in tandem with other relevant meetings as outlined.

Strategy meetings (s.47 children's act 1989)

Local authority children's social care should convene a strategy discussion where there is reasonable cause to suspect a child is suffering or likely to suffer significant harm. The purpose of the meeting is to share relevant information and then decide if the threshold for section 47 enquiries is met. If the threshold is met, the meeting will decide what immediate and short-term action is required, and which agency is going to deliver those actions.

These meetings take place in various forms (person/video call/telephone) and are attended by practitioners from police, health, social care, and other key partners where required. They can be called by any professional involved in a case who needs to discuss it with partners. A strategy discussion is always triggered when a child has been missing for more than 72 hours or who has been missing 3 occasions of more in the space of one month.

Strategy meetings do not take place where a child is a perpetrator unless the threshold for significant harm is met; if the threshold is met, one will take place.

Agency roles and responsibilities are articulated in the Working Together guidance for social workers, health practitioners, and police.

Initial Child Protection Conferences

These meetings are initiated and chaired by social care services and are attended by the family, police attendance from the safeguarding units; other relevant agencies are requested to attend and will always include health, education (if child at school), and other statutory and third sector agencies. Detailed discussions and information sharing takes place to establish situations, assess risk, and make decisions around outcomes for children and their families based upon the collective knowledge of information held across multiple agencies to better understand the risk and to make decisions about safety for the child based upon the collective knowledge held across the various agencies; there will always be a plan formulated and shared with partners as a result of this meeting.

Operation Comfort

Operation Comfort is the Constabulary's response to identifying, monitoring, and disrupting highest risk domestic abuse perpetrators who, in a domestic setting, pose an ongoing and immediate risk to others through their offending behaviour. The meetings are held across the three policing areas and are in place to create opportunities for perpetrator interventions to reduce the risk of such individuals committing further offences involving domestic abuse. The terms of reference for Operation Comfort have been reviewed and re-built to bring parity across the three policing areas.

Managing Risk/Reducing risk

It is evident across the majority of partner meetings that the management of risk is the key focus, but it is accepted that a focus on reduction of risk is currently absent. A proposal which is being tabled is to pursue a culture change across all agencies involved in these meetings, namely, to ask at the conclusion of any decision whether the actions of any meetings has increased, maintained, or reduced risk, and for a rationale to be recorded. Clearly increasing risk would be unacceptable, but maintaining, and ideally reducing risk, would be acceptable.

In summary, work is ongoing to meet this recommendation.

Recommendation 7

That, within three months, Suffolk Constabulary works with its partner organisations to review strategic and operational risk-management meetings for children at risk of exploitation, children reported as missing, and children in families included in multi-agency risk assessment conferences. This is so that good-quality partnership information is presented to support clear and effective strategies and decisions, reducing risks for the children who are included in these meetings.

Response to Recommendation 7

A review is being undertaken with partners of terms of reference and delivery of key meetings in line with HMICFRS recommendation 6. This is ongoing but reference is made to the following actions relevant to key risk management processes.

Child Exploitation

The Constabulary has acted to establish a dedicated Child Exploitation Sub-group which is chaired by the D/Supt CSIM and feeds into the Constabulary's Child Protection Delivery Board. This sub-group includes partner agency representation and operates to a specific term of reference which is to track and deliver against the specific CE issues within the wider CP portfolio, specifically against areas for improvement highlighted within the Constabulary's Child Protection Inspection Report.

The Strategic Aims of the child exploitation sub- group are set as follows: -

- a) *To ensure the constabulary and safeguarding partners expedite HMICFRS recommendations relative to exploitation and,*
- b) *Deliver improvements which will ensure we collectively achieve: -*
 - *The effective identification and protection of vulnerable children who are most at risk of exploitation:*
 - *The effective identification and disruption of offenders who present a risk to the exploitation of children,*
 - *The consistent delivery of an effective investigative response to exploitation, which both captures the voice of the child and delivers positive outcomes for victims.*

The objectives of the child exploitation working group:

- a. *Engage key internal and external partners who can influence and progress activity to meet HMICFRS recommendations 1- 5 and drive improvement work issues identified as summarised in the introduction to this TOR.*
- b. *Fully utilise Operation Hydrant and VKPP and subject matter expertise as necessary to access best practice advice and support local improvement work. This support is partially outlined in the attached NPCC update circulated on 15h November.*
- c. *A key element of improvement work will be to finalise a revised policy and procedure to ensure this addresses HMIC AFI's, recommendations and points arising from consultation. Prior to finalisation input is to be sought from subject matter experts Hydrant/VKPP, not least to ensure this policy is clear on our response and protocols for reviewing and allocating exploitation offences.*
- d. *A further priority is to enable a review of current exploitation governance processes to ensure these are aligned and terms of reference applied which address AFI.*
- e. *Additional emphasis needs to be placed on developing skills and capabilities of generalist and specialist staff through training and again making best use of VKPP/Hydrant offer of support.*

- f. The subgroup will also consider current audit process for exploitation – ensuring this is reflective of best practice and HMIC audit process for inspection of effectiveness of exploitation offences.*
- g. Consider our current metrics and methodology for performance dashboards and scrutiny relative to exploitation cases*
- h. Benchmarking with forces for best practice will also be considered where appropriate again making best use of VKPP support.*

This sub-group will oversee reviews into meetings and processes as summarised in our response to recommendation 6. This will include in particular police tasking and co-ordination (TCG's), Missing, MACE and MARAC processes.

In summary work is ongoing to meet this recommendation.

Recommendation 8

That within three months, Suffolk Constabulary reviews its capability to respond to online offending and to forensically examine electronic devices. This is to make sure it has an effective digital triage capability to examine devices for unlawful digital content. It should also reduce how long it takes for results of forensic digital examinations to be returned to investigating officers.

Response to Recommendation 8

A full review of the Digital Forensic Unit (DFU) which included staff and process mapping has been undertaken and the following key areas have been identified to improve timeliness issues identified by NCPI: -

- Staffing
- Equipment
- Infrastructure & Real Estate
- Current Process

DFU have had a recent upgrade in hardware which has enabled our interrogation process on devices to accelerate. It is vital that we remain at the forefront of technology in both hardware and software. At this time, we have the equipment we need and with an increase of staffing numbers anticipated in the near future then additional devices will be required to ensure that we are able to provide all staff a fully functioning workstation so that we can increase productivity.

We have trialled a system which has the functionality to process multiple devices at once at a faster speed than conventional tower units. With this technology our operators will be able to process devices faster yet retain the same accuracy as conventional machines.

Within DFU there is a fully automated case management system.

The constabulary have been successful in our RRRP Tech Uplift funding bid which will see the purchase of brand new XRY kiosk estate in early 2023.

The DFU will ensure regular review of XRY Estate data is undertaken to identify if equipment is being used regularly, by which staff and identify if there are any training need and provide operational support where required.

The DFU will also ensure that frequent engagement with ICT continues to identify what support is required for the upgrade in Network and to understand what impact in productivity this will have on DFU as the maintenance is carried out.

DFU processes and standard operating procedures are governed by the UKAS ISO accreditation for Digital forensics, following the recent UKAS inspection we have identified and implemented new practices within our SOP's which has reduced bureaucracy.

Demand analysis is reviewed weekly by DFU Manager.

Through regular monitoring of demand, we can track our progress and offer bespoke support to staff where needed through use of the priority submission process where devices when needed can be completed within 24 hours.

Enhancement our digital triage capability

Police investigators are provided legislative powers in order to seize and retain any electronic device provided that legal grounds for seizure are identified. Excessive seizure and submission of devices cause delays within digital forensic departments.

With the use of digital triage tools, electronic devices belonging to suspects can be efficiently reviewed in accordance with the principles of digital evidence. This approach enables investigators to pinpoint devices to seize, therefore reducing submission numbers to forensic departments. This approach should reduce the time all key contributors wait for a judicial outcome.

The Cyber department are actively testing options for triage equipment

The DFU will continue to monitor and track demand weekly, including feedback from investigators using triage equipment when deployed.

The DFU's current drive to invest in staff welfare, expedite recruitment, streamline processes, and introduction of new technology will ensure that performance is optimised, and devices submitted in child protection cases will continue to be prioritised.

Recommendation 9

That within three months, Suffolk Constabulary makes better use of the child abuse image database so it can improve its investigations and safeguarding of child victims.

Response to Recommendation 9

The Constabulary's access to CAID is facilitated through the Digital Forensics Unit who perform an administrative control function to the database.

The victim identification officers within the Internet Child Abuse Investigation Team are responsible for victim uploads onto the CAID system.

The Internet Child Abuse Investigation Team have adopted a process which ensures prior to the closure of a case file the Digital Forensic Unit are notified of a requirement to upload the case onto the CAID database. Without confirmation this is completed, the operational supervisor will not finalise the investigation. With this robust approach cases will be captured and uploaded accordingly.

This data is to be regularly reviewed bi-monthly by the DFU manager to ensure adherence to the documented practice.

ICAIT will receive an uplift of 2 additional victim identification Officers which will create capacity within the team to review current working practises.

Benchmarking will be undertaken to identify those forces who are using CAID in a manner referred to by HMICFRS in terms of upload additional information images, including of vulnerable children and processes used to conduct facial mapping and scene photo searches. Once new members of staff are in place then material obtained from other Forces will be reviewed to seek best practice and identify opportunities that Suffolk can better utilise CAID.

It is our ambition to use CAID to its full capacity, and whilst we are currently not able to amend working processes, as soon as practicable.

Recommendation 10

That within six months, Suffolk Constabulary strengthens its working practices with local authorities to make sure children charged and refused bail are moved to appropriate alternative accommodation and not held in custody overnight.

Response to Recommendation 10

The Constabulary is working closely with the Local Authority at executive level to enhance the provision of bed space for children in a number of different contexts.

There is a rolling programme of recruitment by the local authority for foster carers as, in line with the national picture, demand for carers and beds generally outstrips supply.

In relation to providing alternative accommodation for children who are charged and refused bail, it is important to divide the issue into two provisions, namely secure accommodation, and non-secure accommodation.

In relation to secure accommodation, this is not available in Suffolk. The government guidance to local authorities stipulates that this is not an obligatory provision, and whilst the current provision for alternative accommodation is secure by nature of adults present and basic building security, it is not secure in the sense of cell block standard lock and windows, and accordingly any requests for “secure” accommodation are not able to be fulfilled currently and it would also not be possible to access such placements outside of office hours.

There is a national shortage of secure beds. The local authority has agreed to continue to explore options around secure accommodation with other local authorities in the region however the challenges around funding and physical location will be difficult to resolve. Any such development would require Department of Education approval to fund the capital and revenue costs.

The custody command has developed several operating procedures to a) process child offenders without them being arrested where possible, and b) to ensure children are released from custody as soon as reasonably possible. When children have to remain in custody, on every occasion to ensure that this is within the agreed operating parameters and the local authority are contacted to establish if a bed is available. Custody staff are the decision makers around whether a secure or non-secure bed is required. There are times that the accommodation available is not suitable or safe to meet the young person’s need, and this is logged and recorded on each occasion. Escalation is limited at an operational level as the person making the decision that there is no available bed is often the most senior person on duty and is the emergency duty social worker in consultation with the EDS Operations Manager. Despite an appreciation of the limited provision available, custody staff always request bed provision where required and ensure requests are recorded.

Extending the range of foster care provision is being addressed as part of the rolling programme of recruitment by the local authority. The constabulary will be supporting the local authority with a targeted recruitment campaign which will take place in February, to improve the sufficiency of PACE carers provision.

The Local Authority will also be exploring provisions in other local authority areas and whether such a provision could be utilized by Suffolk when required but is not a firm commitment to developing this provision in Suffolk – this will have to be balanced with sending children out of their home area and the effect this would have on their welfare. The local authorities aim is to maintain young people in Suffolk or neighbouring authorities where possible and safe to do so as placing them further afield comes with significant risks and should be avoided where possible. A joint secure home in the Eastern Region which Suffolk can access would be beneficial.

3) CONCLUSION

Suffolk Constabulary’s NCPI report published in December 2022, identified a number of strengths in our delivery of effective protection of children.

We have continued to prioritise activities which will serve to further enhance our effectiveness at protecting children. Feedback and recommendations arising during the inspection and as part of the recently published report have been swiftly acted upon and progress continues to be monitored through the constabulary’s child protection governance board.



Updates against recommendations as outlined in this report were provided to HMICFRS on 3rd February 2023 and the constabulary awaits further contact in respect of the nature and extent of NCP reinspection requirements.

The constabulary continues to seek advice and support from HMICFRS to ensure it progresses all areas for improvement identified and this includes the progression of a multi-agency learning event to be facilitated by NCP lead inspectors in April 2023.

The constabulary remains totally committed to achieving excellence in protecting the county's children.

Andy Smith

T/Detective Chief Superintendent

12th February 2023