

‘AVON AND SOMERSET – NATIONAL CHILD PROTECTION INSPECTION’

PUBLISHED BY HMICFRS ON 24TH NOVEMBER 2023

AVON & SOMERSET PCC RESPONSE DATED 19TH JANUARY 2024

The first area of focus in my Police and Crime Plan is *vulnerable children and adults*. I think everybody can agree that protecting children is one of the most important things the police do. However, the police cannot achieve this alone and must work with other agencies; particularly important are the partnerships with local authorities. Protecting children will improve lives, improve the community and improve our future.

This report clearly shows that the Constabulary need to improve how they safeguard children. I put questions to the Chief Constable about this report during my Performance and Accountability Board in December 2023. You can [watch the recording on my Facebook page](#).

I welcome the recommendations from this report, of which there are nine for the Chief Constable. These are set out below with the initial response to these after each of them.

It should be noted that I have a legal duty to respond to inspection reports within eight weeks of their publication. However, you will see the Constabulary have longer to fully complete these recommendations: that’s why the responses are still a work in progress. With the support of my office, I oversee recommendations from the inspectorate on a continual basis to help ensure they are completed and will see the results of the audits mentioned.

Recommendation 1

We recommend that Avon and Somerset Constabulary immediately reviews its senior representation in the local safeguarding partnership arrangements to make sure it contributes effectively.

Response

HMICFRS feedback during the inspection fieldwork visit was that the concerns from safeguarding partners related to those partnerships where Chief Inspectors attend the board meetings. The Chief Constable and Chief Superintendent for Neighbourhoods & Partnerships have reviewed the current situation.

Where the Constabulary attendee is a Chief Inspector, they will receive support in performing their partnership role from their Superintendent. In addition, a Child Protection specialist Detective Chief Inspector will provide specialist advice to the Neighbourhood Chief Inspectors where required. Those Constabulary representatives on the safeguarding children partnerships who have not yet completed the Public Protection and Safeguarding Leaders Programme will be immediately enrolled.

Assistant Chief Constable Joanne Hall will lead a review of the Constabulary's working arrangements in accordance with the new national Working Together to Safeguard Children 2023. The review will ensure the arrangements for lead safeguarding partner (LSP) and delegated safeguarding partner (DSP) enable the Constabulary to fulfil its responsibilities as a statutory safeguarding partner agency. The review will include: engagement with the other safeguarding partners across the five partnership areas to agree working practices; ensuring local accountability and child protection expertise at an appropriate level across all child safeguarding partnership boards; ensuring a consistent approach to attendance and delivery across all five partnerships, at both a strategic and operational level.

Recommendation 2

We recommend that, within three months, Avon and Somerset Constabulary works with its safeguarding partners and reviews the effectiveness of arrangements for children at risk of sexual exploitation.

Response

The Constabulary have a number of planned activities to improve how they work internally including the use of data, processes, tasking and training.

The Constabulary also plan to work with safeguarding partners to research and evaluate the benefits of introducing a multi-agency meeting specifically for child exploitation (MACE).

A key component of successfully working with partners is the ability to share data between agencies in order to better understand risk and identify the children in need of protection. However, this is particularly challenging for a number of reasons so the system will rely largely on police data to identify children at heightened risk of child sexual exploitation (CSE).

There are various issues with local authorities sharing data with the police and I will continue to support the police in working with the other organisations to improve this position.

Recommendation 3

We recommend that, within three months, Avon and Somerset Constabulary improves practices to obtain and record children's concerns and views and also note their behaviour and demeanour to help in making decisions about them.

Response

There are a number of ways the Constabulary will aim to improve on this recommendation. Firstly they will amend the vulnerability assessment tool (BRAG) to ensure the requirement to capture the voice of the child, their behaviour and demeanour, environment and lived experience is explicit and readily supports referrals and decision-making. This will also be reinforced through an amendment to the crime management system.

These changes will be supported by revised guidance, in addition to briefings and training across operational policing teams. This will be followed by specific audits to check and test how well officers and staff are implementing these new processes.

Recommendation 4

We recommend that, within six months, Avon and Somerset Constabulary implements appropriate analysis of information and intelligence practices to make sure it understands the risks to children of sexual exploitation.

Response

The Constabulary's Strategic Threat Assessment identifies child sexual abuse and exploitation as a priority for intelligence-gathering, but there is not an up-to-date problem profile for CSE. As a result of this recommendation a new problem profile will be produced. A problem profile is created to:

- provide detail on crime trends or hot spots that require greater analysis than can be provided in the tactical assessment
- provide a vehicle for the application of one or more analytical techniques to a problem
- assist in subject identification and selection (suspects or victims)
- assist in prioritisation
- identify intelligence gaps
- highlight prevention, intelligence, enforcement and reassurance opportunities
- provide justification for actions.

The basis of this problem profile will be limited to Constabulary data due to problems with using partner data mentioned above.

Recommendation 5

We recommend that, within six months, Avon and Somerset Constabulary makes sure that all officers and staff involved in creating and submitting BRAG (Blue, Red, Amber, Green) risk assessments receive training on the purpose and use of the BRAG risk assessment for child protection matters.

Response

The training discussed in response to recommendation 3 will also cover this recommendation.

Recommendation 6

We recommend that, within six months, Avon and Somerset Constabulary updates its assessment and information-sharing practices so it can:

- identify vulnerable children at the earliest possible stage; and
- refer those children without delay to the most appropriate support.

Response

The response to recommendation 3 will help improve here: particularly the identification of vulnerable children.

A review of how the Constabulary's Lighthouse Safeguarding Unit (LSU) work with and support multi-agency safeguarding hubs (MASH) is currently underway. In addition the Constabulary are evaluating whether to implement a 'one front door' approach for all referrals from frontline policing and other specialist teams that routinely work with children.

One specific example where the Constabulary have already made an improvement is in the referrals under Operation Encompass. This is a process where the police make a referral when they have attended a domestic abuse incident with children present. The process has now been automated in order to speed up the flow of information to the local authority to improve the support the children can be given.

Recommendation 7

We recommend that, within three months, Avon and Somerset Constabulary reviews its arrangements for investigating online crime against children and makes sure:

- it reduces the backlog of referrals from national and international law enforcement agencies;
- it quickly identifies risks to children by sharing information with other safeguarding partners;
- it makes decisions in consultation with children's social care to improve the safeguarding response to children; and
- it explains and records decisions about how it manages the risk from offenders, and also addresses wider safeguarding risks the offender may present to other children.

Response

The Constabulary have a specialist team for this type of investigation: the Internet Child Abuse Team (ICAT). To respond to this recommendation it was identified that this small team required additional resource and so six additional investigators will be assigned to support in reducing the backlog.

To improve the information sharing the ICAT Standard Operating Practice has been changed so that a full referral to be made at the point a child is identified as being at risk and a request is made for information to be shared regarding an address or identified person.

Recommendation 8

We recommend that, within three months, Avon and Somerset Constabulary improves its practices for when children are taken into police protection, making sure:

- it always holds strategy discussions with children's social care;
- officers make sure the voice of the child is obtained and recorded to inform decision-making; and
- inspectors regularly review and record their actions regarding the use of protective powers.

Response

The Constabulary are working with Children's Social Care managers in each local authority to gain agreement that formal strategy discussions will be held for all children taken into police protection. This will be supported by training to ensure officers and staff are aware of this duty.

The response to recommendation 3 will help address how the voice of the child is obtained and in particular this will involve reviewing the Police Protection Powers recording forms to ensure this is sufficiently covered.

Recommendation 9

We recommend that, within six months, Avon and Somerset Constabulary implements new arrangements in relation to how it manages registered sex offenders to make sure:

- it quickly identifies risks to children by sharing information with other safeguarding partners; and
- it consults with children's social care services when making decisions to improve the safeguarding response to children.

Response

Registered sex offenders are managed by the Management of Sexual Offenders and Violent Offenders team (MOSOVO). Bespoke child safeguarding training will be included in the MOSOVO training and in the annual continued professional development. A new digital form will also be created to record these referrals when linked to offender visits and risk management plans.

Part of addressing this recommendation is to reduce the backlogs in the team: this is already being addressed as a result of an Area For Improvement from the most recent [PEEL inspection](#). It has been agreed that there will be an increase in Sergeants within the MOSOVO team to improve the oversight and direction of this work.

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