

**Norfolk Police and Crime Commissioner (PCC) response to inspections of Norfolk Constabulary published by His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS)**

*Section 55 of the Police Act 1996 (as amended by section 37 of the Policing and Crime Act 2017) requires local policing bodies to respond to recommendations in inspectors reports within 56 days.*

Inspection Title:	<b>HMICFRS – An inspection of how well the police and National Crime Agency tackle the online sexual abuse and exploitation of children</b>
Published On:	<b>5 April 2023</b>
Publication Types:	<b>Child Protection, National Crime Agency</b>
Police Forces:	<b>National Crime Agency and relevant to police forces</b>
Link to Report:	<a href="#"><u>An inspection of how well the police and National Crime Agency tackle the online sexual abuse and exploitation of children - His Majesty’s Inspectorate of Constabulary and Fire &amp; Rescue Services (HMICFRS) – Home (justiceinspectorates.gov.uk)</u></a>

**KEY FINDINGS:**

His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) thematic report on how well the police and National Crime Agency (NCA) tackle the online sexual abuse and exploitation of children revolved around the following terms of reference question:

*“How effective are police forces, the NCA and regional organised crime units at identifying and safeguarding children affected by online sexual abuse and exploitation?”*

The inspection also assessed how effectively these organisations prevented and investigated this type of crime. It focused on the effectiveness of the police approaches to:

- Identifying and safeguarding children at risk and working with partner organisations to protect children at risk or suffering trauma from online sexual abuse and exploitation.
- Investigating and managing crimes, including use of technology and digital forensics.
- How children are supported through the criminal justice system, including those children who have committed sexual offences.
- Preventing online sexual abuse and exploitation.

HMICFRS' inspection took place between February and August 2022. During their inspection, they carried out the following:

- The inspectorate established an external reference group and regularly discussed their findings and approach. It included representatives from the police service, Government, and the charity and voluntary sector.
- HMICFRS conducted fieldwork in six police forces, two regional organised crime units and the NCA. During this fieldwork, they reviewed documents, policies, and case files. They interviewed leaders, managers, operational officers, and staff. They also hosted focus groups.
- The inspectorate carried out interviews with those in national leadership roles.
- They reviewed force management statements.
- They reviewed relevant literature.
- They reviewed data collected from police forces in England and Wales.

HMICFRS found that there is a clear commitment from national leaders in law enforcement bodies to tackle the growing problem of online sexual abuse and exploitation of children. Existing governance structures at a national level provide a foundation for good oversight and improvement. However, to achieve consistently good practice at regional and force level, the police's response also needs improvements.

They suggested that senior leaders need better processes to understand their local performance, the scale and nature of the demand in their force area, and the risks to children. Furthermore, officers and staff need clearer guidance, supervision, and training so they can meet nationally agreed minimum standards.

HMICFRS also concluded that forces should work more collaboratively with their statutory safeguarding partners and agree joint plans to protect children to prevent them from becoming victims. And they should make sure children who do become victims are offered support.

### **Recommendations:**

There were 17 recommendations made by HMICFRS in their report, eleven of these were directed to forces and Chief Constables across England and Wales, and these are detailed below using the same numbering contained within the report itself:

#### **Recommendation 1**

By 31 October 2023, the National Police Chiefs' Council lead for child protection should work with Chief Constables and Chief Officers with responsibilities for regional organised crime units to introduce regional collaboration and oversight structures to support the Pursue board. This should:

- Improve the link between national and local leadership and the frontline response.

- Provide detailed, consistent scrutiny of performance.
- Meet Chief Constables' obligations for tackling online child sexual abuse and exploitation, as set out in the Strategic Policing Requirement.

#### **Recommendation 2**

By 31 October 2023, Chief Constables, the director general of the National Crime Agency and Chief Officers with responsibilities for regional organised crime units should make sure they have effective data collection and performance management information. This is so they can understand the nature and scale of online child sexual abuse and exploitation in real time and its impact on resources, and so forces and the National Crime Agency can react quickly to provide adequate resources to meet demand.

#### **Recommendation 5**

By 30 April 2025, Chief Constables should make sure officers and staff dealing with online child sexual abuse and exploitation have completed the right training to carry out their roles.

#### **Recommendation 8**

By 31 July 2023, Chief Constables should satisfy themselves that they are correctly sharing information and making referrals to their statutory safeguarding partners in cases of online child sexual abuse and exploitation. This is to make sure they are fulfilling their statutory obligations, placing the protection of children at the centre of their approach and agreeing joint plans to better protect children who are at risk.

#### **Recommendation 9**

By 31 October 2023, Chief Constables and Police and Crime Commissioners should make sure their commissioned services for children, and the process for referring them for support or therapeutic services, are available for children affected by online sexual abuse and exploitation.

#### **Recommendation 11**

By 31 July 2023, Chief Constables and Police and Crime Commissioners should review the advice they publish, and, if necessary, revise it, to make sure it is consistent with the National Crime Agency's ThinkUKnow (Child Exploitation and Online Protection) material.

#### **Recommendation 12**

By 31 October 2023, Chief Constables in England should satisfy themselves that their forces' work with schools is consistent with the national curriculum and National Crime Agency educational products on online child sexual abuse and exploitation.

They should also make sure this work is targeted based on joint analysis with their safeguarding partners.

**Recommendation 13**

With immediate effect, Chief Constables should satisfy themselves that their crime allocation policies make sure online child sexual abuse and exploitation cases are allocated to those with the necessary skills and training to investigate them.

**Recommendation 14**

With immediate effect, Chief Constables should make sure their force meets any existing recommended timescales for activity targeting online child sexual abuse and exploitation and arrange their resources to meet those timescales. Then, six months after the new prioritisation tool is implemented, they should carry out a similar review.

**Recommendation 15**

By 31 October 2023, the National Police Chiefs' Council lead for child protection, Chief Officers with responsibilities for regional organised crime units and the director general of the National Crime Agency (NCA) should review the process for allocating online child sexual abuse and exploitation investigations, so they are investigated by the most appropriate resource. This should include a prompt way of returning cases to the NCA when forces establish that the case needs NCA capabilities to investigate it.

**Recommendation 16**

By 31 October 2023, Chief Constables should work with their local criminal justice boards to review and, if necessary, amend the arrangements for applying for search warrants. This is to make sure the police can secure warrants quickly when children are at risk. This review should include the feasibility of remote communication.

## CHIEF CONSTABLE RESPONSE TO REPORT AND ANY RECOMMENDATIONS:

This report entitled “An inspection of how well the police and National Crime Agency tackle the online sexual abuse and exploitation of children” was a thematic inspection conducted by His Majesty’s Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS).

Norfolk Constabulary was not one of the six police forces inspected.

The inspection has resulted in seventeen recommendations to the police and other bodies which are intended to:

- Reduce the amount of child sexual abuse material on the internet.
- Provide better guidance and training to those who investigate online child sexual abuse and exploitation.
- Improve investigations into those who are a risk to children; and
- Better protect and support children who have been sexually abused, or who are at risk of sexual abuse and exploitation.

Eleven of these recommendations were directed to police forces and Chief Constables across England and Wales. Norfolk Constabulary accepts these recommendations. The Constabulary’s Safeguarding and Investigations Department has reviewed the forces current position against each recommendation and where necessary, has developed a plan to achieve the standards outlined within the timescales set by HMICFRS.

### **Recommendation 1**

**By 31 October 2023, the National Police Chiefs’ Council lead for child protection should work with Chief Constables and Chief Officers with responsibilities for regional organised crime units to introduce regional collaboration and oversight structures to support the Pursue board. This should:**

- **Improve the link between national and local leadership and the frontline response.**
- **Provide detailed, consistent scrutiny of performance.**
- **Meet Chief Constables’ obligations for tackling online child sexual abuse and exploitation, as set out in the Strategic Policing Requirement.**

We have a well-embedded collaborated regional structure. Our Assistant Chief Constable for Local Policing represents the Eastern region on the national Child Sexual Abuse and Child Sexual Exploitation Pursue Board. The Detective Inspector with responsibility for our Safeguarding Children Online Team (SCOLT) attends the Eastern region Child Sexual Abuse and Child Sexual Exploitation Tactical Delivery Group. They also attend the regional Police Online Investigation Team (POLIT) meetings, at which the National Crime Agency and Eastern Region Special Operations Unit (ERSOU) are standing members. We

welcome this recommendation and will provide our full support to the National Police Chiefs' Council lead for Child Protection and ERSOU in their work to further strengthen our collaboration and oversight structures in the eastern region.

#### **Recommendation 2**

**By 31 October 2023, Chief Constables, the director general of the National Crime Agency and Chief Officers with responsibilities for regional organised crime units should make sure they have effective data collection and performance management information. This is so they can understand the nature and scale of online child sexual abuse and exploitation in real time and its impact on resources, and so forces and the National Crime Agency can react quickly to provide adequate resources to meet demand.**

We have developed a data collection and performance framework for online child sexual abuse and exploitation (CSAE) cases. The management information that we collate is reported into our Safeguarding and Investigations Command Quality and Standards meeting. In line with this recommendation, we recognise that our current data collection and analysis processes in respect of online CSAE cases requires further development to ensure that we fully understand the nature and scale of our demand. We are reviewing opportunities to deliver improvements.

#### **Recommendation 5**

**By 30 April 2025, Chief Constables should make sure officers and staff dealing with online child sexual abuse and exploitation have completed the right training to carry out their roles.**

We have a specialist team of officers and staff who investigate online child sexual abuse and exploitation cases; our Safeguarding Children Online Team (SCOLT). The officers and staff who work on this team receive comprehensive role specific training. We do not allow anyone to conduct viewing or grading of indecent images unless they have been appropriately trained. We therefore start from a strong position in relation to this recommendation. We are pleased that Recommendations 3 and 4 of this report will lead to the development of new national guidance and training material for frontline staff and specialist investigators for dealing with online child sexual abuse and exploitation cases. We will seek to incorporate these national products into our existing training offer when they become available.

### **Recommendation 8**

**By 31 July 2023, Chief Constables should satisfy themselves that they are correctly sharing information and making referrals to their statutory safeguarding partners in cases of online child sexual abuse and exploitation. This is to make sure they are fulfilling their statutory obligations, placing the protection of children at the centre of their approach, and agreeing joint plans to better protect children who are at risk.**

Our Safeguarding Children Online Team have established processes in place for sharing information about online CSAE cases with statutory safeguarding partners and for making safeguarding referrals, with multi-agency strategy discussions and joint planning taking place for appropriate cases.

### **Recommendation 9**

**By 31 October 2023, Chief Constables and Police and Crime Commissioners should make sure their commissioned services for children, and the process for referring them for support or therapeutic services, are available for children affected by online sexual abuse and exploitation.**

The Norfolk Sexual Assault Referral Centre (SARC) delivers supports for victims of online sexual abuse and exploitation cases when contact offending is involved. This service is not currently commissioned to provide support for victims of non-contact sexual offending. Children who are affected by online sexual abuse and exploitation are referred for appropriate support through our existing multi-agency arrangements, with the identification of support needs forming part of our multi-agency strategy discussions and planning processes. Support is also available for children who are identified as perpetrators of indecent images cases, through Norfolk's Harmful Sexual Behaviours Team, with the aim of addressing offending behaviour at an early stage.

### **Recommendation 11**

**By 31 July 2023, Chief Constables and Police and Crime Commissioners should review the advice they publish, and, if necessary, revise it, to make sure it is consistent with the National Crime Agency's ThinkUKnow (Child Exploitation and Online Protection) material.**

The National Crime Agency ThinkUKnow educational programme is promoted on our public website, with direct hyperlinking to the ThinkUKnow resources. All guidance that we publish is consistent with the ThinkUKnow messaging. Norfolk Safeguarding Children Partnership's online material also links directly to the ThinkUKnow website.

### **Recommendation 12**

**By 31 October 2023, Chief Constables in England should satisfy themselves that their forces' work with schools is consistent with the national curriculum and National Crime Agency educational products on online child sexual abuse and exploitation. They should also make sure this work is targeted based on joint analysis with their safeguarding partners.**

Norfolk Constabulary has a Children and Young People Team who engage with local safeguarding partners through a range of forums. This helps to ensure that the team deliver educational activity for young people which is based on identified needs. The training content that the team deliver in our local schools has been designed with input from our local safeguarding partners and we have cross-referenced our material with National Crime Agency Child Exploitation and Online Protection (CEOP) products to ensure consistency. The team deliver educational inputs, which are focussed on risk, in all secondary schools across Norfolk. The session that they deliver include packages on online safety, inappropriate stranger contact, the dangers of online sharing, exploitation, and grooming. Year 9 pupils receive a specific input around child sexual exploitation and a relationship abuse package is delivered to Year 10 pupils. These products have been created to align with the Personal, Social, Health and Economic (PSHE) and Relationships and Sex Education (RSE) curriculum, and compliment the content that schools are required to deliver on the subject of online child abuse and sexual exploitation.

### **Recommendation 13**

**With immediate effect, Chief Constables should satisfy themselves that their crime allocation policies make sure online child sexual abuse and exploitation cases are allocated to those with the necessary skills and training to investigate them.**

Our crime allocation policy clearly sets out that online child sexual abuse and exploitation cases will be allocated to our Safeguarding Children Online Team (SCOLT), who have specialist skills and training, as outlined above under Recommendation 5. Low risk cases that involve peer group image sharing amongst children may be allocated for investigation to other non-specialist teams, but the investigating officer will receive advice and guidance from the Safeguarding Children Online Team.



#### **Recommendation 14**

**With immediate effect, Chief Constables should make sure their force meets any existing recommended timescales for activity targeting online child sexual abuse and exploitation and arrange their resources to meet those timescales. Then, six months after the new prioritisation tool is implemented, they should carry out a similar review.**

Our Safeguarding Children Online Team always meet the recommended timescales for very high and high-risk cases. The volume of these cases alongside the need to respond to other spontaneous high-risk demand means that the recommended timescales for medium and low risk cases cannot currently always be met. This would not be possible without significant further investment in resources.

#### **Recommendation 15**

**By 31 October 2023, the National Police Chiefs' Council lead for child protection, Chief Officers with responsibilities for regional organised crime units and the director general of the National Crime Agency (NCA) should review the process for allocating online child sexual abuse and exploitation investigations, so they are investigated by the most appropriate resource. This should include a prompt way of returning cases to the NCA when forces establish that the case needs NCA capabilities to investigate it.**

This recommendation is for the National Police Chiefs Council lead for Child Protection, Chief Officers with responsibility for Regional Organised Crime Units and the Director General of the National Crime Agency.

#### **Recommendation 16**

**By 31 October 2023, Chief Constables should work with their local criminal justice boards to review and, if necessary, amend the arrangements for applying for search warrants. This is to make sure the police can secure warrants quickly when children are at risk. This review should include the feasibility of remote communication.**

We are content with the arrangements that we have in place for applying for search warrants. Our local process has been established on a court circuit basis across ten forces in the South East of England. This is a bilateral agreement between the police forces and His Majesty's Courts and Tribunals Service. It allows us to gain remote access to magistrates and legal advisers at any courthouse in the circuit using an online booking system. This system allows us to readily secure search warrants, including urgent and out of hours applications.

Our ability to sustain our progress against these recommendations and to continue to support effective investigations into CSAE is wholly dependent upon funding keeping up with growing demands. Like all police forces, inflationary pressures, and the costs of increasing regulation, are causing significant financial challenges. The Constabulary will do our utmost to prioritise the investigation of crimes such as CSAE, but our ability to further enhance our response is limited without further financial support or a reduction in the growing regulatory burden.

**PCC RESPONSE TO REPORT AND ANY RECOMMENDATIONS:**

I welcome this thematic report by HMICFRS.

I note that Norfolk was not one of the six forces inspected. Nevertheless, the report provides me with a useful vehicle for my scrutiny of Norfolk Constabulary's efforts to tackle online sexual abuse and exploitation of children. As the Chief Constable notes in his response, Norfolk starts from a generally good position, is embracing all the recommendations, and expects to address these recommendations within the specified time scales.

My one observation is that this report recommends additional activity, e.g. training, that has not been costed. The recommendations across the many HMICFRS reports aggregate to a potentially significant bill for additional resources. At a time when budgets are being squeezed, there is a risk that forces could be forced to 'rob Peter to pay Paul' in order to get by.

In conclusion, I welcome this report and Norfolk Constabulary's response to it.

For Office Use Only:

- ✓ Response forwarded to HMICFRS Section 55 Responses
- ✓ Response forwarded to Chief Constable
- ✓ Response forwarded to Police and Crime Panel
- ✓ Response published on the OPCCN website